

# EXHIBIT B

## Diaz, Elsa Flores v. The Partnership, Inc

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ELSA FLORES DIAZ and )  
EDWIN MEDRANO CACERES, )  
for themselves and on behalf )  
of their minor children )  
E.M.F., V.M.F., B.M.F., and )  
H.M.F., ) No. 1:21-cv-03661-ELR  
Plaintiffs, )  
vs. )  
THE PARTNERSHIP, INC., )  
Defendant. )

DEPOSITION OF  
LATOYA WYNN  
June 2, 2022  
10 a.m.  
Zoom Videoconference

Diondre' Thomas, RPR, CCR-B-2433

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INDEX OF EXAMINATIONS		
BY MR. BLOCK.....	4	
DESCRIPTION OF EXHIBITS		
PLAINTIFF		
EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 1	TPI 00009 - 10	22
Exhibit 2	TPI 00014 - 19	24
Exhibit 3	TPI 00003 - 8	27
Exhibit 4	TPI 00060 - 62	32
Exhibit 5	TPI 003939	46
Exhibit 6	TPI 004148	49
Exhibit 7	TPI 004172	62
Exhibit 8	TPI 004185	81
Exhibit 9	TPI 002615 - 2626	96
Exhibit 10	Eye Q Statement of Work	105
Exhibit 11	The Partnership Inc.	118
	First Amended Answers to	
	Plaintiff First Set of	
	Interrogatories	
Exhibit 12	TPI 000575 - 581	140
Exhibit 13	Diaz 00056 - 63	142
Exhibit 14	TPI 000460 - 461	144
Exhibit 15	TPI 000474	147
Exhibit 16	TPI 002513	151

1 P R O C E E D I N G S

2 LATOYA WYNN,

3 having been first duly sworn, was examined and  
4 testified as follows:

5 EXAMINATION

6 BY MR. BLOCK:

7 Q. Good morning, Ms. Wynn. My name is Aaron  
8 Block and I represent the Diaz family who are the  
9 plaintiffs in this case and I'm going to be asking  
10 you most if not all of the questions today. Okay?

11 A. Okay.

12 Q. Before we get into questions and substance  
13 I'm going to go over some ground rules and things  
14 like that just to make sure you and I are on the same  
15 page about how to do what we are doing today.

16 A. Okay.

17 Q. So that I understand, have you ever had your  
18 deposition taken before?

19 A. Yes.

20 Q. Okay. So you have a general sense of what  
21 we are doing in terms of I ask you questions, you  
22 give verbal answers, and the court reporter writes  
23 everything down?

24 A. Yes.

25 Q. Very good. Probably the most important

1 thing for us is -- it's always important not to talk  
2 over each, but especially since the court reporter is  
3 appearing by phone. We need to give her every chance  
4 to catch all the words we're saying. So I'll try not  
5 to talk over you and you can do that for me too.

6 Okay?

7 A. Okay.

8 Q. Very good. Can you tell me since you have  
9 been deposed before about the circumstances under  
10 which you were deposed before?

11 A. I was working at an apartment in Etheridge  
12 (phonetic) and the tenants had broken into the FedEx  
13 truck. I wanted to make sure I said the right  
14 company. Yeah, they broke in the FedEx truck and  
15 held him hostage.

16 Q. Oh my.

17 A. Yeah.

18 Q. So you were just a witness to --

19 A. I just happened to be the assistant manager  
20 there so we had to do a deposition on it, but I  
21 really wasn't aware.

22 Q. Okay. Have you ever been deposed any other  
23 times?

24 A. No.

25 Q. Have you ever testified in a courtroom?

1 A. Yes.

2 Q. Okay. Could you tell me about that?

3 A. Yes. It was a [unintelligible] something  
4 with a traffic -- it was a traffic violation. It was  
5 an accident. That's all I can remember.

6 Q. Okay.

7 A. I can't really recall. That's it. But I  
8 know I had to do this, so that's all I'm saying.

9 Q. Very good. And by "do this" you mean raise  
10 your right hand?

11 A. Yes, and sworn. And the clerk actually  
12 inside the courtroom did the swearing.

13 Q. Sure.

14 A. That was it.

15 Q. So the clerk swore you in. Okay. Very  
16 good. Well, let's do this before we turn to the  
17 case.

18 Can you tell me what you did to prepare for  
19 your deposition today without telling me about the  
20 substance of any conversations you had with  
21 Mr. Melcher or any other attorney?

22 A. I'm not sure.

23 Q. Well, did you have any meetings -- again  
24 don't tell me about the substance.

25 Did you have any meetings with Mr. Melcher

1 to prepare for your deposition?

2 A. Yeah. Yeah, by phone but not in person.

3 Okay. That's what I want to make sure I'm getting  
4 the question right.

5 Q. Yeah. If I ever ask you a question today  
6 and it doesn't make sense or you don't understand --

7 A. That's why I just wanted -- [overtalk]

8 Q. We don't want anyone to guess or speculate.

9 A. Okay.

10 Q. And I'll assume and the record will sort of  
11 read as if you understood my question if you answer  
12 it, but just make sure you do understand it.

13 Okay?

14 A. Yes.

15 Q. Very good. So it sounds like you had a --  
16 was it just one telephone conference or meeting with  
17 Mr. Melcher?

18 A. In terms of calls I know one, but I don't  
19 think it was too much more.

20 Q. Did you meet or have any discussions with  
21 anyone else who works at Seven Court or for TPI?

22 A. Yes.

23 Q. And who was that that you can recall?

24 A. My boss.

25 Q. Being Mr. Harris?



1 A. Yep.

2 Q. And when was that?

3 A. We talked last week, last Friday.

4 Q. Okay. And that was to prepare for your  
5 deposition?

6 A. Oh, no. I'm thinking you're asking me -- so  
7 you were asking me about the deposition. Okay. Yes.  
8 Just in general the lawyers have us talking not  
9 anything else. It's too much work.

10 Q. Okay. You're probably short staffed like  
11 everybody else.

12 A. So I do apologize. That question I was  
13 thinking when was the last time I talked with my  
14 supervisor so I was a little off on that.

15 Q. Okay. But just so I understand, it sounds  
16 like you did speak with your supervisor Mr. Harris  
17 last week?

18 A. Yes.

19 Q. Was that about this case?

20 A. Yes, about me coming to this deposition.  
21 Yeah.

22 Q. Okay. What did you and Mr. Harris talk  
23 about specifically?

24 A. Well, all of us talked.

25 Q. Oh, Mr. Melcher was part of that as well?

1 A. Yes.

2 Q. I understand. Okay.

3 A. Yes.

4 Q. All right. Did you review any documents or  
5 e-mails or?

6 A. No.

7 Q. Very good. Did you meet or discuss your  
8 deposition or this case within the last few weeks  
9 with anybody else?

10 A. I guess Maggie.

11 Q. And that's Ms. Fontaine?

12 A. Yes.

13 Q. Sure. And when did you discuss the  
14 deposition of this case with Ms. Fontaine recently I  
15 mean. Obviously I know you would have talked about  
16 it before.

17 A. Yeah, that's what I'm asking. We -- I can't  
18 recall the date. Like I don't know if you want  
19 specific dates and times or -- I'm not sure.

20 Q. We will come back to some of those.

21 A. Okay.

22 Q. For instance, there are times we may know.  
23 We have some not all of the e-mails and texts. So we  
24 know when you all were e-mailing about the case.

25 A. Yes.

1 Q. And so if I want to ask you about that --

2 A. Yes.

3 Q. -- I'll just ask you about that rather than  
4 asking you to tell me: Now it was September 29th --

5 A. Correct.

6 Q. -- at 2:00 in the afternoon. So that  
7 wouldn't be fair to you?

8 A. No problem.

9 Q. All right. Well, can you -- I'll try to  
10 give you an outline of where we are going or an  
11 agenda. And so the first thing we're going to do is  
12 just talk about your job --

13 A. Okay.

14 Q. -- what you do at work, who you work for,  
15 things like that. And then we'll go into more of the  
16 specifics of the case. But first we just want to  
17 know about you, kind of your biography.

18 A. Okay.

19 Q. So starting with high school, can you tell  
20 me about your education and work history up to the  
21 present day?

22 A. Yes. I went to Frederick Douglas High  
23 School. I graduated in 1998. After that I started  
24 working in property management. I started out at  
25 Lane Company, and I worked for -- I worked for

1 different companies. So I normally stay four to five  
2 years. I don't really try to move around. And  
3 that's about it. And I go to school.

4 Q. You currently go to school?

5 A. Yes.

6 Q. Where do you go to school?

7 A. I go to Strayer.

8 Q. What are you studying?

9 A. Business management.

10 Q. Oh, that's great. Do you plan to -- what do  
11 you plan to do with that degree when you get it?

12 A. I'll see.

13 Q. See what the economy looks like when you get  
14 your degree. Fair enough. Fair enough. All right  
15 very good. I'm going to ask you questions today and  
16 you'll think: Surely he knows the answer to that.  
17 But sometimes I have to ask these things on the  
18 record.

19 A. Okay.

20 Q. Can you tell me where you work today?

21 A. Yes. I work at Seven Courts Apartments.

22 Q. What is your job at Seven Courts Apartments?

23 A. I'm the property manager.

24 Q. Okay. And what are your job duties as the  
25 property manager at Seven Courts?

1 A. I oversee everything, train, motivate,  
2 teach, supervise, hire vendors, do inspections. I'm  
3 kind of like the overseer of everything to make sure  
4 that the day-to-day operations run properly.

5 Q. And who is beneath you or who is below you?

6 A. Okay. You've got the maintenance  
7 supervisor, you have the assistant manager, the  
8 department maintenance, the maintenance tech and the  
9 grounds position.

10 Q. And then who is above you?

11 A. Rodrick Harris, Cindy Jacob and John Porter  
12 (phonetics).

13 Q. And when did you start working at Seven  
14 Courts?

15 A. At Seven Courts I started working in 2017.

16 Q. And what was your job when you started in  
17 2017?

18 A. Property manager.

19 Q. And you have had the same job since 2017?

20 A. Yes.

21 Q. All right. And have you had different  
22 supervisors over the time that you have been at Seven  
23 Courts?

24 A. Yes.

25 Q. Who did you have before Mr. Harris?

1 A. I had Bonnie Gayner.

2 Q. When was Gayner your supervisor?

3 A. She was my supervisor from the time I  
4 started until -- I really just don't recall when to  
5 end, but she was my supervisor from the time I  
6 started until Rodrick became into the full role  
7 because he had to leave.

8 Q. I see. Just so I have the definitions  
9 correctly, you're a property manager?

10 A. Uh-huh.

11 Q. And then the person who is above you what is  
12 his or her title, Mr. Harris's title?

13 A. Regional manager.

14 Q. Okay.

15 A. Now.

16 Q. Okay.

17 A. Because at first when Bonnie Gayner was  
18 overseeing he was the area manager.

19 Q. Okay.

20 A. And then once Bonnie stopped being my  
21 supervisor, he became the regional manager.

22 Q. Okay. So if we think it up on a pyramid,  
23 it's property manager at Seven Courts?

24 A. Uh-huh.

25 Q. Is the next person up an area manager?

1 A. Yes.

2 Q. And over an area manager is a regional  
3 manager?

4 A. That's correct.

5 Q. Okay. Can you tell me, if you know, what's  
6 the difference between a regional manager and area  
7 manager?

8 A. I would say area would be more than likely  
9 Atlanta, Georgia; and then regional would be Georgia,  
10 Florida, North Carolina, South Carolina like regions.

11 Q. Okay. And am I right that Gayner worked at  
12 TPI until fairly recently?

13 A. Yes.

14 Q. Do you recall roughly when she left?

15 A. No, I don't.

16 Q. Do you know where she is working now?

17 A. No, I do not.

18 Q. Do you know why she left?

19 A. No, I do not.

20 Q. Okay. All right. So sticking with your job  
21 duties as a property manager at Seven Courts for a  
22 little bit.

23 You obviously use e-mail for work?

24 A. Yes.

25 Q. We've seen that. Do you use a cell phone

1 for work?

2 A. Yes.

3 Q. Which cell phone do you use? Like is it a  
4 personal cell phone of yours or a company cell phone?

5 A. No, they don't have that kind of stuff for  
6 managers; but I have my own just work phone so I can  
7 cut it off.

8 Q. Oh, you have a separate. Okay.

9 A. Yeah.

10 Q. And I'll have to ask you these just so the  
11 record is clear.

12 You have a personal cell phone?

13 A. Uh-huh.

14 Q. Which could be for friends, family, what  
15 have you?

16 A. That's correct.

17 Q. You also have a work cell phone?

18 A. That's correct.

19 Q. A different device?

20 A. That's correct.

21 Q. All right. And then do you also in addition  
22 have a Google voice number or anything like that?

23 A. Now I might have one that I created because  
24 I know the job. The residents are going to call my  
25 cell phone number. I might have one, but don't



1 actively use it so I don't know the number. So I  
2 probably have an account.

3 Q. Okay. It's not one that you actively use?

4 A. That's correct.

5 Q. Very good. Very good. And then do you ever  
6 use your personal cell phone to -- or historically  
7 have you to text with any of your coworkers?

8 A. My personal?

9 Q. Uh-huh.

10 A. Yes.

11 Q. And I assume you use your work telephone to  
12 text with coworkers, too?

13 A. Yes.

14 Q. Okay. And do you know -- I'll get the  
15 numbers here. Look, let's do this.

16 Can you just give me the last four digits of  
17 the personal cell phone number?

18 A. Let me just give you both of them --

19 Q. If it's easier.

20 A. -- so I can make sure. 1527, that is my  
21 work number. And then my personal number is 4107.

22 Q. And what kind of -- what brand of devices  
23 are those?

24 A. iPhone.

25 Q. And so you're using the Apple message app --

1 A. That's correct.

2 Q. -- for texting that you do with coworkers?

3 A. No. Apple messages I don't understand.

4 Like the iMessage. [overtalk].

5 Q. I'll just show you mine.

6 COURT REPORTER: Excuse me. Excuse me. Can  
7 you guys hear me?

8 MR. BLOCK: Yep.

9 COURT REPORTER: So we are going to have to  
10 go back a little bit. I need you to stop  
11 talking over each other because for me I'm  
12 actually on Zoom so it cuts you out. It doesn't  
13 just talk over you.

14 MR. BLOCK: I see.

15 COURT REPORTER: As you're talking and you  
16 know, you're saying uh-huh and you're kind of  
17 interrupting, it's kind of canceling out as  
18 you're going on.

19 MR. BLOCK: Okay.

20 COURT REPORTER: So the last thing I have  
21 is: "for texting that you do with coworkers"  
22 and you said Apple and you were going back and  
23 forth kind of quickly. So maybe the witness can  
24 kind of pause after you ask the question and  
25 then answer.

1 THE WITNESS: Okay.

2 COURT REPORTER: Thank you.

3 MR. BLOCK: I'll re-ask those questions.  
4 Thank you. And again, please jump in if you  
5 need.

6 I'll ask you those questions again just to  
7 make sure we get a good, clean transcript on  
8 that.

9 COURT REPORTER: Thank you.

10 BY MR. BLOCK:

11 Q. So I think what you just told me Ms. Wynn is  
12 that you have a personal cell phone that's an Apple  
13 and you have a work cell phone that's an Apple. And  
14 you use both of those cell phones to text with your  
15 coworkers at various times.

16 Is that what you're telling me?

17 A. Yes.

18 Q. Very good. Thank you. And do you recall  
19 whether the lawyers for TPI asked you to look for  
20 text messages on your cell phone that might relate to  
21 this case or to document requests that we made?

22 A. Yes.

23 Q. And which cell phone or cell phones did you  
24 search?

25 A. Both.

1 Q. And did you give text messages from both to  
2 the lawyers for TPI?

3 A. Yes.

4 Q. Thank you. And thank you for doing that.  
5 So I want to ask you a funny question.

6 What company do you work for?

7 A. TMI, LLC.

8 Q. And does TMI, LLC stand for TPI -- well, let  
9 me back up.

10 Is it TMI, LLC or TPI Management Services,  
11 LLC?

12 A. Correct. And you're correct. It is TPI  
13 Management Services, LLC.

14 Q. Okay. And when to your knowledge did you  
15 start working for TPI Management Services, LLC?

16 A. I'm not sure how to answer that question.  
17 I'm not sure how to answer that.

18 MR. MELCHER: If you can't answer then  
19 that's your answer.

20 THE WITNESS: Okay. I don't know the  
21 answer.

22 BY MR. BLOCK:

23 Q. And can you explain why you don't know the  
24 answer of when you started working for your employer?

25 A. Because it was TPI at first and now they've

1 changed and I don't want to give you the incorrect  
2 date of when they changed to that name. TPI  
3 Management Services, LLC, I don't know the correct  
4 date and I don't want to give you the incorrect date.

5 Q. I understand, and I appreciate that you  
6 don't want to speculate. We don't want that either.  
7 We've seen some emails --

8 A. Yes.

9 Q. -- where you had TPI, The Partnership  
10 Inc. --

11 A. Yes.

12 Q. -- on your e-mail until the fall of last  
13 year 2021.

14 A. Okay.

15 Q. And then at some point in the fall probably  
16 in October or November or maybe December of last year  
17 2021, your e-mail signature changed to TPI Management  
18 Services, LLC?

19 A. Okay.

20 Q. Do you think that is about when your  
21 employer changed from TPI to TPI Management Services,  
22 LLC?

23 A. Once again, I'm not sure. I don't handle  
24 that type of thing, so I can't recall either.

25 Q. Can you tell me how you learned that your

1 employer had changed from TPI to TPI Management  
2 Services, LLC?

3 A. They e-mailed us and told us to change our  
4 signature block and it was by e-mail.

5 Q. Do you think that was this calendar year  
6 2022?

7 A. I think -- I don't recall.

8 Q. Here is something I think we can all do.

9 Was it before COVID or after COVID, before  
10 lock down or after lock down?

11 A. After COVID.

12 Q. Okay. That's one of the --

13 A. Do you have a document that I can review?

14 Q. We'll ask for those.

15 A. Okay.

16 Q. I have heard about this e-mail.

17 A. Okay. I just want to make sure right now  
18 for the question.

19 Q. I appreciate that. I don't have it today.  
20 Okay. So let me show you -- I'm going to -- you  
21 probably know I'm going to show you exhibits and  
22 things like that. So I'm going to do the first one.

23 And Madam Court Reporter, in terms of the  
24 exhibits, I actually didn't bring stickers  
25 unfortunately, but I can just hand write the number

1 for the exhibits, and then we will scan that in and  
2 get them sent to you. Does that work?

3 COURT REPORTER: Yes.

4 (Exhibit 1 was marked for identification.)

5 BY MR. BLOCK:

6 Q. So I'm going to mark as Exhibit 1, Ms. Wynn,  
7 a document that has the Bates label -- and you may  
8 know what a Bates label is but I will just show you.  
9 A Bates label is just these numbers down here at the  
10 bottom that say TPI and then some numbers. And that  
11 means it's a document that TPI produced to us in this  
12 case.

13 A. Okay.

14 Q. And they put the numbers so that we all know  
15 what we're talking about when they produce multiple  
16 documents. We do the same thing. So Exhibit 1 is  
17 going to be a document entitled, TPI -- or excuse me  
18 not entitled but with the Bates stamp TPI 00009  
19 through 10.

20 And I will ask you, Ms. Wynn, if you can  
21 look at that Exhibit 1 and tell us what it is if you  
22 recognize it.

23 A. This is my application.

24 Q. You may need to speak up a little bit.

25 A. Oh, this is my application for employment.

1 Q. And something I've wondered about, I believe  
2 you go by Ms. Latoya Wynn today?

3 A. Yes.

4 Q. But I think I've also seen where you go by  
5 Ms. McLester?

6 A. No.

7 Q. No?

8 A. Not anymore

9 Q. Not anymore. But this is your application?

10 A. That is correct.

11 Q. And how would you -- I don't want to  
12 mispronounce your first name.

13 A. It's Tacharmne.

14 Q. Tacharmne. Okay. Tacharmne McLester who  
15 filled out the job application for TPI is you Ms.  
16 Latoya Wynn?

17 A. That's correct.

18 Q. Okay. That's what I thought. I just wanted  
19 to make sure.

20 A. I had a name change.

21 Q. I understand.

22 A. Okay.

23 Q. I didn't know that, but I understand what  
24 you're saying. Okay.

25 If you flip to the second page of this, it



1 looks like your job application was dated and signed  
2 on November 30, 2015?

3 A. That is correct.

4 Q. And the top of the application say: TPI,  
5 The Partnership, Inc. Committed to Excellence in  
6 Affordable Housing. Right?

7 A. That's correct.

8 Q. Did you ever fill out a job application for  
9 TPI Management Services, LLC?

10 A. No, sir.

11 Q. You can actually set Exhibit 1 to the side.  
12 Probably just make a little pile.

13 A. Okay.

14 (Exhibit 2 was marked for identification.)

15 BY MR. BLOCK:

16 Q. And some we will go back to and some we  
17 won't. So I'm going to mark for the record Exhibit 2  
18 a document with the Bates label TPI 00014 through 19.  
19 This appears to be a job description or a couple of  
20 job descriptions, but I'd like you to read it -- and  
21 you don't need to read every word.

22 But take a look at that, Ms. Wynn, and see  
23 if you recognize that document.

24 A. Okay.

25 Q. On the first page, Ms. Wynn, Exhibit 2

1 appears to be a TPI, The Partnership, Inc. job  
2 description for the job of property manager, correct?

3 A. That's correct.

4 Q. And it looks like you wrote your name at the  
5 top?

6 A. That's correct.

7 Q. If you flip to the very next page, it looks  
8 like you signed it and dated it on June 27, 2018?

9 A. That's correct.

10 Q. Okay. And if you go to the next page there  
11 is another TPI, The Partnership Inc. job description  
12 for property manager that says revised 12/2019 at the  
13 top. And if you go to the last page it looks like  
14 you signed it 7/24/2020.

15 Do you see that?

16 A. Yes.

17 Q. Did you ever receive a job description for  
18 the job of property manager from TPI Management  
19 Services, LLC?

20 A. Not that I can recall.

21 Q. So as far as you're aware, your only job  
22 description for the job you have right now is the job  
23 description that TPI gave you and you signed?

24 A. I don't recall that. I do think I might  
25 have signed a new one this year. I do think, but I

1 don't recall. So I can't say yes or no if I have not  
2 did one with the new management.

3 Q. And if you have signed one with the new  
4 management you think it would be this year 2022?

5 A. I don't recall.

6 Q. But if you did you think it probably went  
7 into a personnel file or something like that?

8 A. That is correct.

9 Q. What is your understanding, if any, of the  
10 relationship between TPI Management Services, LLC and  
11 TPI?

12 MR. MELCHER: If you know.

13 BY MR. BLOCK:

14 Q. Yeah, if you know.

15 A. Same company, but I don't know.

16 Q. To your knowledge, who does Q. Jacobs  
17 (phonetic) work for?

18 A. TPI Management Services, LLC.

19 Q. And why do you think Mr. Jacobs work for TPI  
20 Management Services, LLC?

21 MR. MELCHER: Object to the form. Go ahead.

22 THE WITNESS: Because he is my supervisor.

23 BY MR. BLOCK:

24 Q. So you just assume that because he is your  
25 supervisor he works for the same company?

1 A. That's correct.

2 Q. But you don't actually know which company he  
3 works for?

4 A. From his e-mail I would just say he works  
5 for the same company I work for.

6 (Exhibit 3 was marked for identification.)

7 BY MR. BLOCK:

8 Q. Let me show you what I'm going to mark as  
9 Exhibit 3.

10 A. Okay.

11 Q. And this is going to be a document with a  
12 Bates label TPI 00003 through 8. I will give you a  
13 copy of that.

14 Ms. Wynn, looking at Exhibit 3, do you  
15 recognize this as a General Handbook Acknowledgment,  
16 an employee handbook acknowledgment for The  
17 Partnership Inc.?

18 A. Can you repeat your question?

19 Q. Sure. My question was: Looking at the  
20 first page of Exhibit 3, do you recognize this as a  
21 General Handbook Acknowledgment that -- actually at  
22 the beginning it reads: This Employee Handbook is an  
23 important document intended to help you become  
24 acquainted with The Partnership Inc.

25 Do you see that?

1 A. Yes.

2 Q. It looks like you signed this on December 3,  
3 2015?

4 A. Yes.

5 Q. And on the bottom right it says: The  
6 Partnership Inc. 36 of 38 August 2014. Correct?

7 A. Yes.

8 Q. And so in all likelihood, you were signing  
9 an acknowledgment as part of an employee handbook  
10 that was about 38 pages?

11 A. Yes.

12 Q. And if you flip to the next page there is a  
13 document entitled, Receipt of Sexual Harassment  
14 Policy.

15 And you signed again on December 3, 2015 and  
16 this is now page 37 of 38, correct?

17 A. Yes.

18 Q. And so the next page is the Receipt of  
19 Non-Harassment Policy. Again, you signed it on  
20 December 3rd of 2015.

21 And it's now page 38 of 38 of The  
22 Partnership Inc. employee handbook, correct, bottom  
23 right corner?

24 A. Oh, yes.

25 Q. And if you keep going it looks like the next

1 page, TPI 00006, is a General Handbook  
2 Acknowledgment. And if you look at this one it looks  
3 like you signed it on December 20, 2017.

4 Do you see that?

5 A. Yes.

6 Q. And here at the very bottom it says: The  
7 Partnership Inc. Employee Handbook 2017. Correct?

8 A. Yes.

9 Q. And the next page of this document is again  
10 a Receipt of Sexual Harassment Policy, and then the  
11 last page is a Receipt of Non-Harassment Policy from  
12 the 2017 The Partnership Inc. Employee Handbook.

13 Do you see that?

14 A. Yes.

15 Q. I'm going to ask you some questions about  
16 these, but do you know if you were ever given an  
17 employee handbook for TPI Management Services, LLC?

18 A. I don't recall.

19 Q. All right. I want to ask you about the  
20 Non-Harassment policy and I'm reading from the last  
21 page. I think that's in front of you. And it  
22 says -- I'm quoting here: "It is TPI's policy to  
23 prohibit intentional and unintentional harassment of  
24 any individual by another person on the basis of any  
25 protected classification including, but not limited

1 to, race, color, national origin, disability,  
2 religion, marital status, veteran status, sexual  
3 orientation or age."

4 Do you see that?

5 A. Yes.

6 Q. And is that your understanding of TPI's  
7 Non-Harassment policy?

8 A. With everything that is written there, yes.

9 Q. And do you know whether TPI Management  
10 Services LLC even has a Non-Harassment policy?

11 A. I don't recall.

12 Q. You've never been given one?

13 A. I could have, I just don't recall. If you  
14 have a document that I can review, I can see if  
15 that's my signature. I just don't recall.

16 Q. I sure don't have one.

17 A. Okay.

18 Q. I don't think there is one?

19 A. Okay.

20 Q. So let me ask you, do you know what the Fair  
21 Housing Act is?

22 A. Yes.

23 Q. Can you tell me what your understanding of  
24 the Fair Housing Act is?

25 A. Do you have something I can look at to make

1 me know?

2 Q. I don't. But I will tell you, I'm not  
3 asking you for a lawyerly definition that gets all of  
4 the details exactly right.

5 Can you give me -- you're an experienced  
6 property manager?

7 A. Treat everyone fairly.

8 MR. MELCHER: Good.

9 BY MR. BLOCK:

10 Q. Sure. Sure. Is it your understanding of  
11 the Fair Housing Act that it is illegal under federal  
12 law to discriminate against rental tenants on the  
13 basis of race, national origin and characteristics  
14 like that?

15 A. That's correct.

16 Q. Okay. And do you know whether TPI or TPI  
17 Management Services, LLC has ever made you sign a  
18 written policy saying that the company complies with  
19 the Fair Housing Act?

20 MR. MELCHER: Object to the form. Go ahead.

21 THE WITNESS: I don't recall.

22 BY MR. BLOCK:

23 Q. I understand. Where did you -- and I  
24 recognize you've been in this industry, by which I  
25 mean the property management industry for a long



1 time, but can you tell me if you remember how you  
2 came to understand what the Fair Housing Act forbids?

3 A. Different trainings on Grace Hill.

4 Q. Anywhere else?

5 A. Different training in Grace Hill.

6 Q. And those are trainings that the Grace Hill  
7 Company sells and your employer buys and shows you?

8 A. It's a class we have to take annually.

9 Q. Sure. Sure. And Grace Hill is the company  
10 that makes the class?

11 A. The software. Yeah.

12 Q. The software. Yeah, I've seen online you  
13 can go buy Grace Hill classes if you want to. I'm  
14 just trying to define for the record what Grace Hill  
15 is.

16 A. Yeah.

17 Q. It's like a third-party vendor. It's not a  
18 TPI company is all I'm saying?

19 A. That is correct. I have used it on other  
20 management companies, that's what I was saying, not  
21 just TPI or management services. I have been in  
22 property management 20 years and I have been using  
23 Grace Hill on and off for years.

24 (Exhibit 4 was marked for identification.)

25 BY MR. BLOCK:

1 Q. I'm going to show you what I will mark  
2 Exhibit 4 and it's TPI 00060 through 62. I will give  
3 you a minute to look at that.

4 Ms. Wynn, do you see at the top where  
5 Exhibit 4 says: Transcript for Ms. Wynn?

6 A. That's correct.

7 Q. Have you ever seen this before, this  
8 document?

9 A. Yes. This was like Grace Hill. I have to  
10 do it for my employer.

11 Q. Very good. I wanted to make sure that we  
12 both knew what we were looking at.

13 A. Yes.

14 Q. I understand it to be the transcript of  
15 Grace Hill classes you have taken.

16 Is that your understanding?

17 A. Yes.

18 Q. It looks to me like, if you go down about a  
19 third of the way on the first page, you took a class  
20 entitled, Fair Housing 2, on January 19, 2021 and got  
21 a score of 87 percent.

22 Do you see that?

23 A. Yes.

24 Q. And if we go down again toward the bottom  
25 there is a class entitled, Fair Housing and Social

1 Media, that you took on March 25, 2020 and a class  
2 entitled, Fair Housing 2, that you took on March 4,  
3 2020.

4 Do you see those?

5 A. Yes.

6 Q. And if you flip the page -- and a lot of  
7 these classes are about things like stress  
8 management, sexual harassment, defeating the mold  
9 monster. I'm looking at the second page here.

10 This is sort of many of the issues that you  
11 might confront in property management, correct?

12 A. Yes.

13 Q. If we keep going down on that second page  
14 again about a third of the way down it looks like you  
15 took Fair Housing 2 again on looks like February 8,  
16 2019 and got an 80 percent?

17 A. Oh, okay. I'm down at the bottom.

18 Q. Down at the bottom. You took that  
19 12/22/2017 and you got a hundred percent. And on the  
20 last page you took Fair Housing 2 and Fair Housing  
21 (TDHDA) in January of 2017.

22 Do you see that?

23 A. Yes.

24 Q. So it looks to me like you have been taking  
25 a Fair Housing class or two from Grace Hill it looks

1 like roughly once a year since 2017.

2 Is that fair?

3 A. Correct.

4 Q. In addition to those call them annual Fair  
5 Housing classes, do you do any other kind of Fair  
6 Housing compliance training at Seven Courts?

7 A. Other than Grace Hill, no, sir.

8 Q. Do any of your bosses ever meet with you to  
9 ensure you're complying with the Fair Housing Act and  
10 making sure you understand what the Fair Housing  
11 requires of you?

12 A. I don't recall.

13 Q. And do you know whether Seven Courts --  
14 whether there has ever been an investigation of  
15 whether you all who work at Seven Courts are  
16 complying with the Fair Housing Act?

17 A. Yes.

18 Q. Can you tell me about those investigations?

19 A. If you have the documents in front of you I  
20 can.

21 Q. I don't. I would love to see them, but I  
22 don't have them.

23 What do you remember?

24 A. I don't recall everything.

25 Q. Let's start with things you might remember.

1 Do you remember when it was roughly?

2 A. No.

3 Q. Was it before COVID or after COVID?

4 A. I want to say during COVID, but I can't  
5 recall it, that's why I'm asking you to give me  
6 documentation. I can't recall it.

7 Q. Just so you know, I have to ask TPI for  
8 documents and it takes a bit to get them sometimes.  
9 So if there are things I don't have it's not because  
10 I don't want them or because I want to keep them from  
11 you. It's just because I don't have them. So I'm a  
12 little bit in the dark too. So I'll ask for that.  
13 I'm looking at Jeff now and we'll definitely follow  
14 up on them. The reason I'm asking you about the  
15 specific document in hand is because I don't have it  
16 that I know of.

17 A. Okay.

18 Q. So it sounds like you think -- and again,  
19 we're going with the best of your recollection, but  
20 you think during COVID so during 2020 or maybe 2021?

21 A. Uh-huh.

22 Q. I think we felt like we were still doing  
23 COVID in 2021. Maybe we're still doing it, I don't  
24 know. I think it depends on who you ask and where  
25 you are in the country.

1 At some point in the last two years you  
2 think there was a Fair Housing Act investigation?

3 MR. MELCHER: If you can remember, sure. If  
4 you don't, you don't.

5 THE WITNESS: I can't remember. That's the  
6 problem.

7 BY MR. BLOCK:

8 Q. Well, do you remember what the gist of the  
9 investigation was about?

10 MR. MELCHER: Yeah, if you know.

11 THE WITNESS: It was a resident that had  
12 moved out said that she was -- I just can't  
13 remember what the claim was. That's what I'm  
14 saying. I just know that -- I just can't  
15 remember the claim, but it had to do with that.  
16 And of course, we won.

17 BY MR. BLOCK:

18 Q. When you say "you won," do you think this  
19 was a lawsuit?

20 A. Yes.

21 Q. I don't think you were deposed as part of  
22 the lawsuit because you told me your only deposition  
23 had to do with --

24 A. Yes. So no, we didn't have to go that far.  
25 Correct.

1 Q. Okay. Do you think -- okay. So it was a  
2 lawsuit. And it was a female tenant?

3 A. That's correct.

4 Q. Do you recall whether she alleged she had  
5 been discriminated against on the basis of her sex?

6 A. I don't recall.

7 Q. And again, we are just asking what you  
8 recall, but it'll help us all understand what it is  
9 we are looking for here.

10 Do you recall whether she alleged that she  
11 was discriminated against based on her race or  
12 national origin?

13 A. No.

14 Q. You seem pretty confident about that. Why  
15 are you --

16 A. That's just --

17 Q. Just her allegation?

18 A. We haven't had those type of allegations.  
19 That's what I'm saying. It wasn't that.

20 Q. Was she an older person maybe or a disabled  
21 person?

22 A. I can't recall. Okay.

23 Q. We will just have to go look. I'm sure  
24 there is a way to find the answer. Okay.

25 Other than that investigation or lawsuit

1 maybe an investigation of the claims in the lawsuit,  
2 do you know whether TPI has done anything to ensure  
3 that you and the people who work underneath you at  
4 Seven Courts are complying with the Fair Housing Act?

5 A. Yes. They make sure we have the Grace Hill  
6 training.

7 Q. And beyond the Grace Hill training is there  
8 anything?

9 A. No, sir.

10 Q. Do you understand that in this case or do  
11 you understand that in this case one of the claims is  
12 that TPI and specifically you as a TPI employee  
13 engaged in discrimination that is alleged to violate  
14 the Fair Housing Act?

15 MR. MELCHER: Objection.

16 BY MR. BLOCK:

17 Q. I'm asking if you understand that's an  
18 allegation in the case, not that you agree with it?

19 A. Okay. Yes.

20 Q. I'm just trying to lay a foundation for  
21 these questions.

22 A. Yes.

23 Q. So other than any meetings or discussion  
24 that you might have had with Mr. Melcher or the  
25 attorneys working with him, do you know whether TPI



1 did anything to investigate whether, in fact, you and  
2 other people at Seven Courts were discriminating on  
3 the basis of race or national origin as alleged in  
4 this case?

5 A. Not that I recall.

6 Q. Just so I understand, other than -- well,  
7 there wasn't an investigation in this case, and you  
8 told me about the investigation or lawsuit involving  
9 the woman whose a tenant that moved out.

10 Other than those two, are you aware of any  
11 other time that TPI has investigated to determine  
12 whether there is Fair Housing Act discrimination  
13 going on at Seven Courts?

14 A. No.

15 Q. All right. You know I think I forgot to ask  
16 you this. I'm going to turn now to Seven Courts.

17 We obviously know something about Seven  
18 Courts but can you just describe Seven Courts for us  
19 for the record, in terms of like where is it, what is  
20 it, you know how many people live there and things  
21 like that. If you met someone at a party and they  
22 said, Oh you work at Seven Courts.

23 What is Seven Courts? Can you just give us  
24 that description?

25 A. Seven Courts we have 170 units. It's 100

1 percent tax credit. We have 30 units that are from  
2 Atlanta Housing Authority and those tenants come from  
3 down there. We do not do a waiting list for those  
4 tenants on site. They are sent to us by Gateway and  
5 they are based on income and they have some type of  
6 or may have some special needs, such as mental or  
7 physical disability is what the requirement is for  
8 the housing based on their income limits.

9 Q. So if I understand you correctly, I think  
10 you're telling me that Seven Courts has some sort of  
11 relationship with Atlanta Housing to place people who  
12 needs housing?

13 A. That's correct.

14 Q. Atlanta Housing is a government agency  
15 helping to place them?

16 A. That's correct.

17 Q. And that may explain it. If I have one it's  
18 in this box and I'd have to dig it out, but I have  
19 seen reports that I think you submit to Atlanta  
20 Housing every so often.

21 Would that be why you're submitting reports?

22 A. That's correct.

23 Q. I see. So maybe in a general sense, Atlanta  
24 Housing is just trying to keep tabs on what you're  
25 doing with the Atlanta Housing tenants?

1 A. They require it of all the properties  
2 monthly, and that is how we request the payment  
3 application for the money that we need.

4 Q. Very good. So I have heard different  
5 definitions, but can you give me a sense of the  
6 demographic of the tenants at Seven Courts?

7 A. All different. There is not no specific  
8 demographic. We have African American, we have  
9 Hispanic and we also have white and I think now  
10 Indian. We have a mixture. I can't just you know do  
11 a breakdown.

12 Q. Sure. Is it mostly one or two call it  
13 background types?

14 A. I would say probably more half and half  
15 bilingual tenants and African American tenants. I  
16 mean I could be wrong, don't quote me, but that is  
17 just my opinion. I'm not giving you numbers because  
18 we don't do that.

19 Q. I understand. I'm just asking for a rough  
20 estimate not a precise mathematical estimate.

21 And by bilingual you mean Hispanic?

22 A. That's correct.

23 Q. And those two languages presumably are  
24 English and Spanish?

25 A. That's correct.

1 Q. So it's roughly 50/50 African American and  
2 bilingual Hispanic?

3 A. That's correct.

4 Q. How would you describe your relationship  
5 with tenants?

6 A. Overall I'm the manager, I'm tough, they  
7 don't like me.

8 Q. You have a job to do?

9 A. That's correct.

10 Q. And maybe some people don't want you to do  
11 the job the way you're doing the job?

12 A. No. They don't like nobody telling them  
13 when they're breaking the rules. The ones that don't  
14 break rules they have no problem.

15 Q. Who sets the rules at Seven Courts?

16 A. Well, the company does and we also do GAA  
17 leases. I think that's a state level too, and we  
18 comply with their rules and regulations.

19 Q. When you say "the company sets the rules,"  
20 you mean TPI?

21 A. Because we use GA Community rules and  
22 regulations, and then we have a TPI Seven Courts  
23 apartment rules and regulations and it has TPI logo  
24 on that.

25 Q. Right. I have seen that. I have a copy of

1 that. It's actually an addendum to the lease that  
2 you make tenants sign, correct?

3 A. That's correct.

4 Q. Yes. We have a copy of that. I have to ask  
5 you some of these questions.

6 You probably are not going to be too  
7 surprised but, do you ever yell at tenants or raise  
8 your voice at tenants?

9 A. No. I do talk loud, but no.

10 Q. You don't yell at tenants?

11 A. No.

12 Q. Would that be appropriate?

13 A. No. I mean, no, I'm not yelling at tenants.  
14 I don't, no.

15 Q. Have you ever had a physical altercation  
16 with any tenant?

17 A. Yes. I have been attacked four times at  
18 this property.

19 Q. And I have seen one or two of the police  
20 reports on that?

21 A. Yes.

22 Q. I won't make you recount those, but is it  
23 your testimony that the tenant was the aggressor in  
24 those instances?

25 A. Yes.

1 Q. I have seen one or two police reports to  
2 that effect?

3 A. I have an open case right now.

4 Q. It's like a criminal case?

5 A. No. A lady, she attacked me. I have a case  
6 open, civil, right now.

7 Q. You have a civil case against the lady who  
8 attacked you?

9 A. No. The court -- the police wouldn't -- and  
10 I have a case open right now and because of COVID  
11 they are pushing it back. At first it was just one  
12 charge. They actually dropped to another charge now  
13 that is going to be where she probably has to do time  
14 because she made me bleed. I think the first one was  
15 just disorderly conduct, and then they moved it from  
16 disorderly conduct to something else.

17 Q. I'm going to show you something in a second,  
18 but I have to ask you, have you ever had any family  
19 member who lived at Seven Courts?

20 A. Yes.

21 Q. Which one?

22 A. My sister Tasharah Wright.

23 Q. Have you ever had any other family members  
24 who lived at Seven Courts?

25 A. No.

1 Q. Does your sister still live at Seven Courts?

2 A. Yes.

3 Q. You don't live at Seven Courts?

4 A. No.

5 Q. Why do you say no that way?

6 A. I haven't lived on site in 20 years. Living  
7 on site is.

8 Q. You're never away from your job?

9 A. Yes. That's why I said that.

10 (Exhibit 5 was marked for identification.)

11 BY MR. BLOCK:

12 Q. Let me show you what I'll mark as Exhibit 5  
13 and it's TPI 003939. Ms. Wynn, Exhibit 5 appears to  
14 be an e-mail from Horace Holt to your boss Rodrick  
15 Harris from July 2, 2020 with the subject family  
16 member.

17 I will ask you first, have you ever seen  
18 this family member before?

19 A. No, sir.

20 Q. I'm going to ask you to read it and then I  
21 will ask you about the circumstances.

22 A. Okay.

23 Q. So I'll give you a second. Well, actually I  
24 will just read it for the record so there is not  
25 guesswork. It reads -- this is from Mr. Holt to Mr.

1 Harris: "This resident reach out to me today. She  
2 live in D-29 and it Toya sister that live in D-30 she  
3 cannot sleep for the last three to four night cause  
4 they always up there party. When she report it to  
5 the office they told her to leave. You can hear the  
6 music in the background."

7 Do you see that?

8 A. Yeah.

9 Q. There is a picture of a wall and then there  
10 was a music attached with some music coming through a  
11 wall. I didn't bring a copy of the movie.

12 I just want to ask you, do you remember what  
13 Mr. Holt is describing here where a tenant who lived  
14 next to your sister complained about loud music if  
15 you remember?

16 A. Okay. I have never seen this e-mail.

17 Q. Sure.

18 A. But when you elaborated about the picture --  
19 the picture and the video was sent to my phone, but I  
20 have never seen this e-mail. That's why I wanted to  
21 be correct.

22 Q. I understand.

23 A. She actually lived downstairs and yes I do  
24 recall. I talked to the resident and she let me know  
25 that that was not the case. The resident still lives



1 there now.

2 Q. I want to make sure I understand. First,  
3 how did you get a copy of the picture and the video?

4 A. Mr. Holt sent it to me.

5 Q. Mr. Holt okay. And then you went and talked  
6 to the resident from D-29?

7 A. No. I actually had Maggie call because I  
8 did not want them to think because someone was my  
9 sister that I wouldn't enforce the rules because that  
10 was my job. After talking to both of them, they were  
11 actually friends. They had a love triangle.

12 Q. Could you explain?

13 A. A love triangle.

14 Q. They were upset about a man I guess?

15 A. No. I wouldn't say a man would be involved.  
16 A love triangle.

17 Q. All right. Triangle is three people, right?

18 A. Yeah.

19 Q. So we've got your sister and the resident  
20 from D-29.

21 Who was the other point in the triangle?

22 A. It would be another woman.

23 Q. Okay. All right. I understand. So the  
24 resident of D-29 was upset with your sister because  
25 of this love triangle?

1 A. That's correct.

2 Q. So when Mr. Holt said that he thought when  
3 she reported it to the office they told her to leave.

4 Did that happen?

5 A. She never came to the office and she had  
6 reported it to Rodrick.

7 Q. Do you think Mr. Harris investigated this  
8 allegation?

9 A. Most likely she did. But the lady in the  
10 D-29 she still lives there.

11 (Exhibit 6 was marked for identification.)

12 BY MR. BLOCK:

13 Q. You can put that aside. Let me show you  
14 what I'll mark as Exhibit 6. This is for the record  
15 TPI 004148. Describe this for the record. I will  
16 give you a minute to read while I describe it.

17 This is an e-mail thread between Mr. Holt  
18 again and your boss Mr. Harris from April, 2020. I'm  
19 going to ask you the same kind of questions, have you  
20 seen this and do you know about this incident. So  
21 just read it.

22 The main thing I want to start with is at  
23 the bottom. And just for the record this reads from  
24 Mr. Holt to Mr. Harris: "I text Toya and let her  
25 know that I got a complaint about her daughter making

1 other fight and trying to force the other girl to  
2 have sex with other guys. Instead of Toya texting  
3 back she called back went up to C-18 and got her  
4 daughter. C-18 have been in jail for over three in  
5 half months. But her rent still get paid. C-18 has  
6 been having a lot of under age people in there. It  
7 has now been secured when I brought it to her  
8 attention."

9 I will pause there. Ms. Wynn, have you ever  
10 seen this e-mail before?

11 A. No.

12 Q. Are you familiar with this incident?

13 A. He texted me a lot.

14 Q. He being Mr. Holt?

15 A. Yes.

16 Q. Do you remember Mr. Holt texting you about  
17 the allegation that your daughter was making other  
18 people fight and trying to force the other girl to  
19 have sex with other guys?

20 A. I don't recall that, and I did give y'all  
21 permission to get my text messages from him. I don't  
22 recall that. He texted me that. I think he sent me  
23 a separate text. I don't recall this text about my  
24 daughter.

25 Q. Well, whether you learned about it by text

1 or some other means, do you remember the allegation  
2 that your daughter --

3 A. No. That's what I'm telling you. My  
4 daughter wasn't apart of the allegation.

5 Q. So without your daughter in it, do you  
6 remember this allegation about --

7 A. Yes.

8 Q. -- sex issues in C-18?

9 A. That is correct. Yes.

10 Q. Tell me about the sex issues in C-18?

11 A. That is his allegations that he wrote it up  
12 and put it -- sent it to us. Those was his  
13 allegations. When we investigated it was found out  
14 to not be true.

15 Q. What investigation did you do?

16 A. We sent the infraction.

17 Q. So you sent a written infraction?

18 A. And asked the parent to come to the office.

19 Q. I guess the parents who lived in C-18?

20 A. That's correct.

21 Q. What happened? When the parents came to the  
22 office what happened?

23 A. That was -- she was furious of the  
24 allegations.

25 Q. And so what did you do?

1 A. Nothing.

2 Q. I mean what would you have said to the  
3 parent?

4 A. Well, once we sent the infraction and she  
5 said that her daughter was not having intercourse and  
6 this was untrue and it's harassing her, then, you  
7 know, we just -- but like I said, when he texted me,  
8 Mr. Holt, he did not text my daughter.

9 Q. He wasn't texting about your daughter?

10 A. He texted and said, if you look at this text  
11 I can't recall it, but this e-mail is not the wording  
12 that he used when he texted me. That's what saying.

13 Q. And do you think you still have the text  
14 that he sent you?

15 A. I'm not sure because I have an iPhone and  
16 the numbers -- this is from 2020. I'm not sure.

17 Q. Have you had the same cell phone numbers  
18 since 2019?

19 A. No, I have not.

20 Q. Oh, okay. I should have asked you that  
21 before. So tell me how your cell phone numbers have  
22 changed?

23 A. I have yet to give that information. I'll  
24 give you this number too.

25 Do you want to go on record for this number?

1 Q. Sure.

2 A. (404) 599-8035. That was the number that I  
3 had.

4 Q. When?

5 A. When I started -- no, that wasn't. That was  
6 the number that I got. I also had another number  
7 when I started.

8 Q. I'll keep it a little bit -- I'll try to  
9 keep it simple. So let's just start in 2019.

10 A. Well, Mr. Holt has had all of those numbers.

11 Q. Sure. So let's do it this way. In 2019,  
12 what were your cell phone numbers?

13 A. 2019, I can't recall. I will have to look  
14 at my cell phone bill to tell you.

15 Q. At some point in 2019, 2021 or '22, you  
16 changed your cell phone number?

17 A. The beginning of '21 I did.

18 Q. Why did you change your cell phone number?

19 A. Personal stuff for instance.

20 Q. Was that your personal cell phone number  
21 that you changed?

22 A. Yes, I only had one phone for a long time.  
23 As I have learned that's not good, so I decided to  
24 purchase me another phone. That's why I have two  
25 phones for work so I can -- on the weekends I can

1 re-program and reset and not just look at the phone.

2 Q. Sure. When did you get that work phone?

3 A. I can't recall, but I can log in. I can't  
4 recall that date.

5 Q. Do you use the Apple iCloud to back up your  
6 phone?

7 A. No.

8 Q. Do you have an iCloud account?

9 A. No.

10 Q. Wow.

11 A. I use G-mail. My e-mail is  
12 latoyawynn22@gmail.com. My kids do. They know how  
13 to do all of that stuff. I usually it really for the  
14 Facetime.

15 Q. How do you get apps on your iPhone?

16 A. Because when you log into Apple, you can use  
17 your personal e-mail. I don't have an iCloud e-mail.

18 Q. I see what you're saying. So you log in  
19 with your G-mail account. That's how you log into  
20 Apple?

21 A. That's correct.

22 Q. And that allows you to back up what's on  
23 your phone like your photographs?

24 A. I would say for storage, yes.

25 Q. Because one of the things depending on your

1 settings you can actually back up your text messages  
2 to iCloud, and then you have them as far as the  
3 back-up?

4 A. I'm not a tech person.

5 Q. I'm gathering that.

6 MR. MELCHER: We can answer all of those  
7 questions separately.

8 BY MR. BLOCK:

9 Q. All right. So let's stick with Exhibit 6.  
10 One of the other things that Mr. Holt reported to  
11 Mr. Harris in April 2020 was -- this is at the very  
12 bottom: "On Thursday at A build I sent report. Toya  
13 gave the guy a parking pass and he don't even live on  
14 the property and he was damage the property by  
15 burning rubber. He walked out the office and said I  
16 don't run nothing. I post pic of the 911 call in the  
17 report Thursday."

18 Okay. So you told me you have a Tennessee  
19 number. Do you remember the allegation by Mr. Holt  
20 that you had given a parking pass to someone who was  
21 not a resident and who was damaging the property by  
22 burning rubber?

23 A. I don't recall that at all.

24 Q. Do you recall whether Mr. Harris asked you  
25 about that incident?



1 A. No. I don't recall that at all.

2 Q. You can put that one aside. We will talk  
3 about Mr. Holt in greater detail later. We will come  
4 back to the Holt e-mails. I want to sort of stick  
5 with Seven Courts.

6 Ms. Wynn, have you ever owned any businesses  
7 that provides goods or services at Seven Courts?

8 A. Yes.

9 Q. Can you tell me about that?

10 A. A paint and cleaning service, janitorial.

11 Q. What was the name?

12 A. Five Star Contractors, and I also helped out  
13 Mr. Owens A&T Contractors.

14 Q. What was the name?

15 A. Mr. Anthony Owens, I helped him out.

16 Q. And what was the name of his business?

17 A. A&T. It's no longer around.

18 Q. A&T?

19 A. Uh-huh.

20 Q. And what did A&T do?

21 A. They're both janitorial companies that were  
22 painting and cleaning companies.

23 Q. So for example, if you needed to clean an  
24 apartment in between tenants Five Star or A&T would  
25 do that work?

1           A. No, they never was -- they wasn't as one.  
2       So we have different business. We have Rent Ready  
3       that paint and clean. We have C&K. So it was just  
4       another painting and cleaning company that I had as a  
5       back-up.

6           Q. So when did Five Star -- or excuse me. So  
7       who owns Five Star Contractors?

8           A. I do.

9           Q. And do you have any other co-owners?

10          A. No.

11          Q. When did Five Star Contractors provide  
12       services for Seven Courts?

13          A. I started last year actually. We were  
14       having a problem with people. They have a little  
15       thing now with the I9 that they -- I mean, not the I9  
16       -- the COI. Particular insurance used to just only  
17       require general liability. They started wanting  
18       workers' comp. And we have a lot of vendors that  
19       actually have the skills and the knowledge and the  
20       work to do it, but they don't have -- we pay by  
21       check. We don't pay through Cash App and through  
22       Zelle. So I seen a need and I just tried to help the  
23       company to get people because it was hard during  
24       COVID. We couldn't find nobody.

25          Q. So you actually perform the work for Five

1 Star Contractors?

2 A. Oh, I contract it out to different vendors.

3 Q. And did TPI know that you owned Five Star  
4 Contractors while Five Star was performing work at  
5 Seven Courts?

6 A. I mean, they knew of the vendor and they  
7 approved of it; but no, I don't think that they knew  
8 I was the owner of it. No.

9 Q. And did TPI at some point learn that you  
10 were the owner?

11 A. Yes, they have.

12 Q. How did they learn?

13 A. Thanks to Mr. Holt.

14 Q. Tell me about that.

15 A. That's it. That's all I have to say, thanks  
16 to him.

17 Q. And what happened?

18 A. I ceased my business.

19 Q. Were you disciplined?

20 A. Yeah.

21 Q. Can you tell me about that?

22 A. Just a write-up.

23 Q. Who wrote you up?

24 A. Rodrick at work.

25 Q. Who is Laurie?

1 A. Laurie is the human resource. They always  
2 have a witness when someone is either being fired or  
3 terminated. There's always a witness.

4 Q. What is Laurie's last name?

5 A. Laurie Connor (phonetic) I want to say, but  
6 I'm not putting that on the record.

7 Q. I understand. I think I've seen Laurie  
8 Connor in a few emails?

9 A. Okay.

10 Q. Does she work in Florida, Laurie Connor?

11 A. Yes.

12 Q. And did she come to Atlanta to discipline  
13 you?

14 A. No.

15 Q. Then how did she witness?

16 A. It was on the phone.

17 Q. All right. So I think you told me a second  
18 ago that Five Star Contractors were approved as a  
19 vendor?

20 A. Yes.

21 Q. And who approved Five Star Contractors?

22 A. It's not -- I'm going to explain to you the  
23 process. It's just making sure like I said the COI,  
24 they have a general and the workers' comp, and then  
25 they need the W9. So it's not like a check that you

1 -- no background check or nothing like that.

2 Q. So in terms of like -- walk me through how a  
3 vendor in this case Five Star Contractors actually  
4 gets approved to start performing work for Seven  
5 Courts?

6 A. We send it to accounts payable and they  
7 submit back and let us know here's the new vendor ID,  
8 so we can start sending their invoices in.

9 Q. And is that accounts payable at TPI?

10 A. That's correct. Well, I don't understand.

11 Q. Explain to me what you don't understand.

12 A. Okay. I don't understand because you're  
13 saying TPI and you asked me about TMI and so I don't  
14 want to say yes. It seems like you're tricking me  
15 with the TPI.

16 Q. Well, I'm not the one playing tricks?

17 A. Oh, okay. That's fine. I just didn't want  
18 to say yes. So I'm just going to say my corporate  
19 office for Seven Courts.

20 Q. That's the corporate office in Florida?

21 A. That's correct.

22 Q. And at least it used to be called TPI?

23 A. That's correct.

24 Q. And at some point somebody told you it's not  
25 really TPI?

1 A. It's changed that's correct. It's TMI  
2 Management Services LLC.

3 Q. Excellent. Did any of your relatives ever  
4 have a company that provided services at Seven  
5 Courts?

6 A. No.

7 Q. Did you ever have any family members who did  
8 painting at Seven Courts?

9 A. No. Friends, I mean associates. I went to  
10 friends that was high school. They say don't give  
11 you no information but I am going to let you -- that  
12 five minutes away. I am very active in my community.  
13 I mean, it's networking. It's nothing wrong with  
14 that. So yes, classmates. They're not my family  
15 members, they are friends.

16 Q. And do your friends ever share with you any  
17 of the revenue that they generate when they perform  
18 services for Seven Courts?

19 A. Sometimes, yes, and I actually help people  
20 do their books.

21 Q. And does anyone -- I will call it corporate.

22 A. Okay.

23 Q. Does anyone at corporate know that sometimes  
24 your friends who provide services share the revenue  
25 with you?

1 A. No. Let's go back on record. No friend  
2 shares revenue with me. No friend shares revenue I'm  
3 on record.

4 Q. Okay. Explain to me what's going on.

5 A. Because you're confusing me. Okay. So we  
6 might have a parking company. We have a plumbing  
7 company. We have a roofing company. All of those  
8 companies, that's just people that I might know of or  
9 work with and we built a relationships. I don't get  
10 any kick back or anything from them. That's why I'm  
11 going on record because you're kind of confusing me  
12 with that.

13 Q. Are you telling me that you sometimes  
14 perform like bookkeeping or accounting services for  
15 those companies?

16 A. That's correct.

17 Q. And you're compensated for those services?

18 A. No.

19 Q. You just do it for free?

20 A. That's correct.

21 (Exhibit 7 was marked for identification.)

22 BY MR. BLOCK:

23 Q. Let me show you what I'm marking Exhibit 7,  
24 which is TPI 004172.

25 And to describe this for the record,

1 Ms. Wynn, this is another e-mail from Mr. Holt to  
2 your boss Mr. Harris. This one is from March 10,  
3 2020 with the subject line report. And the gist of  
4 this one appears to be that a resident was moving in  
5 and the unit was not ready to be moved in.

6 Do you see that in all caps on the second  
7 line?

8 A. That's correct.

9 Q. And the tenant it sounds like was  
10 understandably upset. I want to ask you about what  
11 Mr. Holt said to your boss: "Didn't report it to  
12 Toya because the residents are afraid of her already  
13 and don't want to be retaliated against."

14 So my question for you is: Did Mr. Harris  
15 ever discuss this allegation with you?

16 A. No.

17 Q. Did Mr. Harris ever discuss with you any  
18 allegations that the tenants were afraid of you?

19 A. No.

20 Q. Did Mr. Harris ever discuss with you any  
21 allegations that the tenants were afraid you might  
22 retaliate against them if they complained?

23 A. No.

24 Q. Do you think any of the residents have been  
25 afraid of you?



1 A. No.

2 Q. Have you ever retaliated against a tenant  
3 for complaining?

4 A. No.

5 Q. Why would Mr. Holt say this about you?

6 A. Clearly he does not like me.

7 Q. Why not? What is your sense of why Mr. Holt  
8 doesn't like you?

9 A. From my research I guess he -- I mean,  
10 that's why I asked for him to be removed. He likes  
11 me, sir.

12 Q. What do you mean likes you?

13 A. Likes me.

14 Q. In a romantic or sexual way?

15 A. I guess so. And I don't like him at all.

16 Q. So you asked for him to be removed  
17 because --

18 A. That's correct. He was harassing me and  
19 Maggie.

20 Q. And when was that?

21 A. That's when he was first let go.

22 Q. And then he came back?

23 A. Yes.

24 Q. All right. So who did you tell, if anyone,  
25 that Mr. Holt was harassing you and Maggie?

1 A. My regional and my area manager.

2 Q. And their names are?

3 A. Bonnie Gayner and Rodrick Harris.

4 Q. What did they say?

5 A. Bonnie asked me to give him a 30-day notice  
6 and I did.

7 Q. And Ms. Gayner said that was because  
8 Mr. Holt was sexually harassing you --

9 A. No. It was on multiple things, not sexual  
10 harassment. He was harassing me at the time. I just  
11 didn't know what his motive was.

12 Q. Explain that harassment to me.

13 A. Okay. He would text all of the time, all  
14 kind of things that was not related to the job.

15 Q. Such as?

16 A. It's a bus up the street. When are you  
17 going? Are you going down the protest? Different  
18 things, and that is what made him think I was mean.  
19 Like I put on record, I don't with a vendor. I  
20 don't.

21 Q. We've asked and we don't have all of your  
22 texts with Mr. Holt.

23 A. That's fine.

24 Q. We will get them. It sounds like you're  
25 telling me he was texting you about irrelevant

1 topics, but the texts were not sexual in nature?

2 A. That's correct. But the things he did was  
3 on that nature.

4 Q. Can you tell me what those are?

5 A. Looking at me was on that nature.

6 Q. He would look at you in a way that you felt  
7 was sexual?

8 A. That's correct.

9 Q. Did he say anything that was sexual?

10 A. Not that I could hear or a witness could  
11 hear.

12 Q. What do you mean by he would look at you in  
13 a sexual way?

14 A. When he first started he would do that so I  
15 kind of pushed him off on my assistant because I  
16 didn't want that type of conflict and because he had  
17 been referred by Atlanta Housing Authority. To my  
18 understanding, he was held on a level. So I just  
19 didn't want any confusion or conflict with him, so I  
20 just kind of pushed him on Maggie.

21 Maggie reported the same thing, that he was  
22 calling and texting after work. She actually had a  
23 boyfriend. And I then got our communication back and  
24 had him communicate with me only, which he still  
25 refused.

1 Q. What other problems did you have with  
2 Mr. Holt? The first time he worked there, what other  
3 problems did you have?

4 A. Falsifying, not being at work, not doing  
5 things to help management, he was always  
6 argumentative with me after the situation, that's  
7 about it.

8 Q. What did he falsify?

9 A. He falsified that people would be selling  
10 drugs out there. He would make up stories and  
11 have me -- that's the only reason why I got attacked  
12 was from his report that he sent in. And he actually  
13 sent in that an old lady was a drug dealer. Her  
14 whole family came up there because I, of course,  
15 entered the infraction based off of his allegations  
16 which were false and they were able to prove that he  
17 was actually picking on them. So he had  
18 relationships with people out there.

19 Q. What do you mean by relationships?

20 A. Like a relationship.

21 Q. Like a sexual relationships?

22 A. Yes. I actually seen him with a lady and  
23 once I seen him I think he thought I was onto him. I  
24 was actually really just doing like a walk through of  
25 the property. I didn't understand why he was there

1 during the day, and I mentioned that to Roger.

2 Q. You told me those are your complaints about  
3 Mr. Holt the first time.

4 Do you think that he was not doing a good  
5 job providing security at Seven Courts?

6 A. Yes. I think he was not doing a good job at  
7 all.

8 Q. And why not?

9 A. So Bonnie Gayner -- that was one of the  
10 things. It's required by TPI to do a lighting report  
11 and to do a daily activity report. Those are things  
12 like this -- not just this specifically but anything  
13 that occur we can refer back to it. And we have an  
14 incident report, you know, things like that. He just  
15 wouldn't do it. He just would not do it.

16 And so one e-mail Bonnie asked isn't his  
17 reports just getting non-detailed. Like the quality  
18 of his service and work had went down tremendously,  
19 and my supervisor had seen it.

20 Q. So then what happened to Mr. Holt?

21 A. We gave him a 30-day notice.

22 Q. And you know Mr. Holt continued working for  
23 TPI at a different TPI property, right?

24 A. That's correct. Because he's working up  
25 under the area manager. At the time Bonnie Gayner

1 was the regional.

2 Q. And so what were your views about the fact  
3 that TPI kept Mr. Holt?

4 A. It was fine. I'm kind of like -- like I  
5 said, I don't --

6 Q. He wasn't at your property anymore?

7 A. Yeah.

8 Q. And Mr. Holt came back to Seven Courts  
9 later, right?

10 A. Unfortunately yes.

11 Q. Tell me what you thought about that.

12 A. That was not my decision. I had three other  
13 security companies and at that time Mr. Hickey  
14 (phonetic) was leaving. It was told to me that he  
15 was coming, so that was not my decision to bring him  
16 back. But because I'm not a confrontational person  
17 and I am working with myself. I love myself.

18 Challenges like that -- I felt like it was  
19 just a challenge and I accepted it, because I didn't  
20 have an issue with him. And maybe this time he would  
21 do his job and we wouldn't have a problem, but that  
22 still didn't happen.

23 Q. What were your complaints about --

24 A. He refused to do the reports, he refused to  
25 do the lighting reports, which was required by TPI.

1 He just wouldn't do -- but he would do fresh  
2 investigations all the time. And he would tell me,  
3 "I'm at the police station right now, I can't talk to  
4 you" or it may be simple questions I just need the  
5 answer.

6 Q. Do you know or did you know someone named  
7 John Habies (phonetic) who went by Lee Brown  
8 (phonetic)?

9 A. That's correct. I did. He was a tenant  
10 there. He was one of the AHA tenants that I was  
11 telling you about with the mental and physical  
12 disability. He actually has a mental disability.

13 Q. And AHA is the Atlanta Housing Authority?

14 A. That's correct. Did I say "AHA," I'm sorry?  
15 AH.

16 Q. AH.

17 A. It used to be AHA, so I do apologize.

18 Q. Atlanta Housing whatever?

19 A. They dropped the A.

20 Q. Very good. Did you have a romantic  
21 relationship with him?

22 A. No.

23 Q. Can you think of why anyone might see you  
24 two as having a romantic relationship?

25 A. Okay. I've been working at that property a

1 long time like I told. When I first got to Seven  
2 Courts, Mr. John A aka Mr. Brown did not like me.  
3 Okay. Because I enforced the rules. He wanted to  
4 sit out.

5 But working with them, the supportive  
6 housing team, and learning so much more, like I said,  
7 they -- those residents if you rode through there  
8 they look and act normal at times, but then they can  
9 just spiral out. There could be different things  
10 that trigger it, and so I had to learn about that.

11 So instead of making people be my enemy or  
12 they not liking me, I decided to pull him up under my  
13 wing and give him little things to do, as in keeping  
14 the building clean for us. He actually works with  
15 Rainbow Services as a volunteer. And the residents  
16 didn't know that because we don't have to share that.  
17 He got a -- what is the company called? AARP, he  
18 worked with AARP. Okay. And the residents didn't  
19 know that, so they assumed that he was my uncle or  
20 that he was my boyfriend. He really was getting  
21 paid. But like I said, that's how they are, they  
22 talk.

23 Q. These are the residents?

24 A. This is the residents.

25 Q. Let's go back to Seven Courts. What kinds



1 of crimes tend to occur at Seven Courts?

2 A. Do you have a crime report I can look at and  
3 tell you.

4 Q. We've got a bunch.

5 A. Okay.

6 Q. But from your memory, what kind of crimes do  
7 you tend to see there?

8 A. Sometimes we use the incident, that explains  
9 it to me. So had a BMW that he claimed that was  
10 stolen. This is on record. Just about three months  
11 prior to that we had another resident that said the  
12 same thing. On both occasions the cars were repoed.  
13 So stealing of cars is not something that goes on out  
14 there. That's what I'm trying to explain to you.  
15 But I mean the typical things that I have seen are  
16 property management, and it's no more than nowhere  
17 else.

18 Q. What kinds of things? What kind of crimes  
19 do you see at Seven Courts?

20 A. Loitering, disturbance, I have witnessed --  
21 I wasn't there but I have been there, we had a  
22 murder.

23 Q. You had two murders, right?

24 A. Yes now. I thought we were just talking  
25 about --

1 Q. Yeah. So there was a murder in April of  
2 2019?

3 A. Yes.

4 Q. And there was a murder within the last 60  
5 days?

6 A. That's correct. Yes.

7 Q. And there are robberies, armed robberies at  
8 Seven Courts, right?

9 A. The armed robberies, I'm not -- I might know  
10 a little something, but they haven't been confirmed.  
11 That's all I'm saying.

12 Q. How would you confirm an armed robbery?

13 A. I mean where the police witness it, they got  
14 cameras. We've got actual -- yes, they were robbed  
15 or armed robbed. We have people --- people say  
16 anything.

17 Q. There are allegations of robbery?

18 A. Yes.

19 Q. Now cameras are funny, right, because y'all  
20 didn't have working cameras for the longest time,  
21 right?

22 MR. MELCHER: Objection to the form.

23 BY MR. BLOCK:

24 Q. That was a yes, right?

25 A. No, I didn't answer.

1 Q. You did not have working cameras at Seven  
2 Courts until the end of 2021, correct?

3 A. I don't recall.

4 Q. So other than a camera catching an armed  
5 robbery, what would it take to make an armed robbery  
6 verified or confirmed in your mind?

7 MR. MELCHER: Objection to the form. If you  
8 know.

9 THE WITNESS: Like I said, it would have to  
10 -- to where the police or detective came back  
11 and verified to me that it was an armed robbery.

12 BY MR. BLOCK:

13 Q. So if the police come out on a 911 call and  
14 someone reports an armed robbery, that is not  
15 verified to you?

16 A. No.

17 Q. Why not?

18 A. Because the residents, they will falsify a  
19 lot of things. Like I just gave you an example of  
20 two people calling me, saying that someone stole  
21 their car and within one day the police called me  
22 back and said, hey, you were right, they were repoed.

23 I explained to them that when they outsource  
24 the repo company, the paperwork don't always go  
25 through right then. So sometimes when they are

1 calling the actual company that did the repo, they  
2 are saying no we didn't repo it, but they're not  
3 knowing that like individuals have these things on  
4 their car and if they ride through they go ahead and  
5 pick it up.

6 So that's what I'm saying. The residents  
7 have been known out there to falsify things.

8 MR. MELCHER: Can we take a short break?

9 MR. BLOCK: Yes. Off the record.

10 (A short break was taken.)

11 BY MR. BLOCK:

12 Q. We are going to go back on the record.

13 Ms. Wynn, I want to keep talking about crime at Seven  
14 Courts.

15 A. Okay.

16 Q. Is there drug crime at Seven Courts?

17 A. Yes. Well, it had been. I mean, I can't  
18 say now, but yeah.

19 Q. When was there drug crime at Seven Courts?

20 A. I can't give you a date, but I can give you  
21 an incident when we did have a drug bust.

22 Q. So roughly when was that?

23 A. I can't give you the date.

24 Q. But are you telling me that now there are  
25 not drug crimes at Seven Courts?

1 A. I can't tell you. I don't recall or know of  
2 anything.

3 Q. Are there guns? Whether anyone is injured  
4 are guns fired with any regularity at Seven Courts?

5 A. Not that I recall. So you have to remember  
6 that property is 24 hours. I'm only there 8 hours.

7 Q. So as the property manager isn't it your job  
8 to know whether there is crime at Seven Courts even  
9 if it's during the hours that you're not there?

10 A. If they report it. But if I'm not given the  
11 report, it's not my job to get the crime report. I  
12 don't do that.

13 Q. Do you think that knowing what kind of crime  
14 -- and you work regular business hour 9:00 to  
15 5:00-ish Monday through Friday?

16 A. Correct.

17 Q. And a lot of dangerous crime happens at  
18 night when it's dark outside, right?

19 MR. MELCHER: Objection to the form.

20 THE WITNESS: I don't know.

21 BY MR. BLOCK:

22 Q. You don't know whether more crime happens at  
23 night or during the day?

24 A. No. I don't recall. I'm not a police or a  
25 detective. I don't know that answer.

1 Q. And you don't think it's your job to find  
2 out so that you can keep the property safe?

3 MR. MELCHER: Objection form, argumentative.

4 MR. BLOCK: There's no form problem there.

5 MR. MELCHER: It's already noted as --

6 MR. BLOCK: I can do that during  
7 cross-examination, Jeff.

8 MR. MELCHER: Okay. Well --

9 MR. BLOCK: I'm going to ask you not to make  
10 form objections unless there is a technical  
11 problem with the form of the question.

12 MR. MELCHER: I will make the objections as  
13 I see fit.

14 MR. BLOCK: If it's compound or something  
15 like that make a form objection otherwise don't  
16 obstruct.

17 MR. MELCHER: You want to get the judge on  
18 the phone, because I'm going to make my  
19 objections.

20 MR. BLOCK: To teach you how to make a  
21 proper objection?

22 MR. MELCHER: Okay. Let's take a break.

23 MR. BLOCK: Madame Court Reporter, we will  
24 take a short break.

25 (A short break was taken.)

1 BY MR. BLOCK:

2 Q. Back on the record.

3 Ms. Fontaine -- excuse me. I'm looking at  
4 an e-mail from Ms. Fontaine. You're Ms. Wynn.

5 Ms. Wynn, during your time as property  
6 manager at Seven Courts have you ever done anything  
7 or been instructed by TPI to do anything to make sure  
8 that the company is aware of crime that is happening  
9 at Seven Courts outside of business hours?

10 A. No, sir.

11 Q. Do you think that TPI should have such a  
12 policy?

13 A. I don't have an answer to that.

14 Q. Is there gang activity at Seven Courts?

15 A. I don't recall.

16 Q. Are there break-ins at Seven Courts?

17 A. I think there have been -- some people  
18 called in, but it hasn't been proven.

19 Q. So you think there are mistaken or  
20 fictitious allegations of break-ins at Seven Courts?

21 A. That's correct.

22 Q. Your answer was yes, that's correct?

23 A. Yes, that's correct.

24 Q. I just wanted to make sure that the court  
25 reporter could hear you. I'm going to ask you about

1 your own safety but there is a big exception here  
2 because you were attacked four time by tenants. So I  
3 assume that made you feel unsafe on some level?

4 A. No, sir.

5 Q. No?

6 A. No, sir.

7 Q. You didn't feel unsafe when the four tenants  
8 attacked you?

9 A. No, sir.

10 Q. Why not?

11 A. Because I was property management and this  
12 is the type of property that I worked. I have been  
13 doing this for 20 years, sir. I have been attacked  
14 at all of the properties I worked at. When people  
15 don't get their answer, they get aggressive. And a  
16 lot of the residents out there are aggressive because  
17 they're -- for whatever reason. I'm not sure --  
18 following medications, prescribed or not prescribed.  
19 I don't know. No, I do not not feel safe out there.

20 Q. So other than the tenants attacking you, are  
21 there ever times when you have felt unsafe at Seven  
22 Courts?

23 A. Not that I can recall.

24 Q. Do you ever take any precautions for your  
25 own safety at Seven Courts?



1 A. I don't understand the question.

2 Q. Well, do you -- I don't know, as an example,  
3 maybe if it's dark outside and you want to park  
4 closer to where you're going or you want to be on the  
5 cell phone with somebody or you want to carry a  
6 weapon, you know, like you can do under Georgia law.

7 Do you ever do anything like that to keep  
8 yourself safe at Seven Courts?

9 A. No. No.

10 Q. Do you own a firearm of your own?

11 A. Yes, I do.

12 Q. Do you take it with you to work?

13 A. I do not understand that question still.

14 Q. We can talk about your motivation but, do  
15 you take your firearm to work with you?

16 A. Yes. My firearm is in my car.

17 Q. Does it stay in your car while you're in the  
18 office?

19 A. That is the policy.

20 Q. What policy?

21 A. TMI Management Services LLC.

22 Q. Was it TPI's policy before that?

23 A. No. It was a policy that changed.

24 Q. Tell me about the policy change.

25 A. I think the policy said we could not have it

1 at all, and then they changed it that we can have it  
2 in the car. It cannot go in any apartment or any  
3 common area, like in the office.

4 Q. You can't wear your weapon on your hip?

5 A. That's correct.

6 Q. Okay. When did that policy change so you  
7 could at least bring your weapon to the premises in  
8 your car?

9 A. I don't recall. I just know it was a change  
10 because it was more of the maintenance guys at  
11 another property, not my property.

12 Q. They were allowed to have a weapon?

13 A. Yeah. So like I said, it was a TPI policy.  
14 It wasn't Seven Courts, so I don't recall it.

15 Q. Did we talk about Laurie earlier? You  
16 mentioned Laurie.

17 A. Yes.

18 Q. Is her last name Light, L-I-G-H-T?

19 A. I don't -- that's why I said earlier, I  
20 don't recall. The e-mail now I think it's Connor.  
21 So that's why I'm saying I don't recall.

22 (Exhibit 8 was marked for identification.)

23 BY MR. BLOCK:

24 Q. That's easy enough to answer. I appreciate  
25 that. Let me ask you about the next exhibit which

1 will be Exhibit 8. Exhibit 8 for the record will be  
2 TPI 004185. There you go. Exhibit 8, Ms. Wynn, is  
3 an e-mail thread between Robert Harris, Bonnie Gayner  
4 and you. And it appears that the start of this  
5 thread is actually an from Horace Holt to the e-mail  
6 address sevenscourt@gotip.org with a subject line  
7 report, and then it appears that you and Mr. Harris  
8 and Ms. Gayner were e-mailing about Mr. Holt's  
9 report.

10 Do you see that?

11 A. Yes.

12 Q. And do you remember receiving this e-mail?

13 A. It says I received it, yes.

14 Q. Do you have any memory of receiving it?

15 A. No, I don't recall it.

16 Q. But I want to ask you --

17 sevenscourt@gotip.org is an email address that we have  
18 seen.

19 What is your understanding of what that  
20 e-mail address is for?

21 A. This is my work e-mail.

22 Q. The sevenscourt@gotip.org?

23 A. Oh, no, that's the property's e-mail I'm  
24 sorry.

25 Q. And what is the property's e-mail

1 sevincourt@gotip.org used for?

2 A. That actually goes to everybody. It fills  
3 to me, the assistant, the regional, corporate. I'm  
4 not sure who but it's an e-mail that fills to  
5 everybody.

6 Q. And if you look, Mr. Holt in March of 2020  
7 sent an e-mail from his report apparently from that  
8 day about when he was on duty and what we observed,  
9 including rats and possums and a foul smell. And he  
10 was there for it looks like three or four hours. And  
11 then Gayner wrote back or not back but wrote to you  
12 and Mr. Harris to say, "Do we need them more than  
13 three hours a night? Thanks."

14 Do you see that at the top?

15 A. Uh-huh.

16 Q. And Mr. Harris wrote back: I think so.

17 Do you see that?

18 A. Yes.

19 Q. Do you know whether you responded to this  
20 e-mail?

21 A. Not if you have it --

22 Q. This is all that I have. My question for  
23 you is: Did you agree with Mr. Harris that you all  
24 needed Mr. Holt or some armed security more than just  
25 3 hours a night?

1 A. I don't have an answer to that question.

2 Q. And why not?

3 A. Because that's personal. I just go by what  
4 corporate wants and needs. I don't object to what  
5 they want us to have.

6 Q. Help me understand. How do decisions get  
7 made about what security measures should be in place  
8 at Seven Courts?

9 A. Okay. Can you re-ask the question, please?

10 Q. Sure. I want to understand if you can help  
11 me how are decisions made about what kind of security  
12 measures will be in place at Seven Courts?

13 A. So I can just tell you how the process  
14 works. If we are looking for security me or someone  
15 in the office will call three or four vendors, we  
16 will get security bids and then we will submit them  
17 in. Me, Rodrick or whoever the regional or area  
18 manager decides, okay, what company we will go with,  
19 and then they start. I hope I answered the question.

20 Q. I understand how you might select a vendor.

21 A. Okay.

22 Q. I think that's what you just described to  
23 me.

24 A. Yes.

25 Q. How does someone or who decides whether

1 you're going to have let's say armed security in the  
2 first place?

3 A. I would say that would be on a corporate  
4 level.

5 Q. And who decides how much armed security, in  
6 other words, how many hours a day the security  
7 officer will be on site?

8 A. Once again, that's corporate. That is a  
9 step in processing the budget.

10 Q. And who decides how much money is going to  
11 be spent on security for Seven Courts?

12 A. I don't know that answer.

13 Q. It's not you? Sorry I think I talked over  
14 you.

15 Is it you, the property manager, who decides  
16 how much money will be spent on security at Seven  
17 Courts?

18 A. No, sir.

19 Q. In your understanding as the property  
20 manager for Seven Courts, who does make the decision  
21 about how much money is going to be spent on  
22 security?

23 A. Once again it's done at corporate and it's  
24 part of budgeting.

25 Q. And by corporate do you mean TPI?

1 A. I mean, the management company that manages  
2 Seven Courts.

3 Q. So whoever manages Seven Courts is going to  
4 make the decision about how much money to spend on  
5 security?

6 A. That's correct.

7 Q. And to your understanding, it's happening  
8 above your level somewhere?

9 A. That's correct.

10 Q. Somewhere in Florida?

11 A. I'm not sure.

12 Q. It seems like most of the corporate people,  
13 if not all, work in Florida and that's why I said  
14 that. I don't need you to weigh in on geography.

15 A. Would you like to number this one?

16 Q. Oh, thank you. This is 8. All right. I  
17 want to walk through security guards, a sort of  
18 chronology of security guards.

19 Mr. Holt started in 2019 after the April of  
20 2019 murder?

21 A. Incorrect.

22 Q. No. What's wrong?

23 A. That's not when he came.

24 Q. When did he come?

25 A. He came after we had the drug bust.

1 Q. When was that?

2 A. That was after the murder.

3 Q. But he started in 2019?

4 A. That's correct. That's why I wanted to make  
5 sure that I didn't answer the question incorrectly.  
6 I know you're tricking me.

7 Q. Okay. I'm not trying to trick you. I  
8 actually thought you e-mailed that he was hired  
9 because maybe even the former security guard was  
10 somehow involved with the murder, but I don't know.

11 A. No, that is not what happened.

12 Q. There was a body, but I don't know who shot  
13 them?

14 A. The security guard they was there.

15 Q. That's right. They were there and obviously  
16 not enough to stop the shooting, but they weren't  
17 involved actively?

18 A. That's correct.

19 Q. I knew there was some issue with the  
20 security guard. Okay. So they're out clearly.

21 You get Mr. Holt in 2019?

22 A. That's correct.

23 Q. When did Mr. Holt leave to your recollection  
24 Seven Courts the first time?

25 A. When my supervisor Bonnie Gayner instructed



1 me, asked me to give him 30-day notice. I don't know  
2 the date and time exactly.

3 Q. We have that from the notice so that's fine.

4 A. Okay.

5 Q. Did you have a security guard after that?

6 A. That's correct.

7 Q. Who was that?

8 A. Mr. Hickey.

9 Q. And how long was Mr. Hickey the security  
10 guard at Seven Courts?

11 A. I don't know the exact time, so I'm just --  
12 I'm not giving a direct date, but I would say  
13 probably roughly a year.

14 Q. And we could just look at I guess the  
15 records for when Mr. Hickey worked there rather than  
16 asking you to remember?

17 A. That's correct.

18 Q. We can do that. Do you remember whether any  
19 type of security -- let me strike that. It's not  
20 fair necessarily asking you questions and you just  
21 told me you don't remember something. I will come  
22 back to that one.

23 Speaking generally, did you think that Seven  
24 Courts needed an armed security guard?

25 A. All of the properties I ever worked at had

1 armed security guards.

2 Q. And you think that's important?

3 A. I don't think unarmed is even necessary.

4 Q. Can you explain what you mean there?

5 A. If you're unarmed to me I work there and I'm  
6 unarmed. Why would we need security if they are  
7 unarmed.

8 Q. Okay. So I misunderstood. I think what  
9 you're telling me is if you're going to have security  
10 for them to be effective they need to be armed?

11 A. That's correct.

12 Q. What do you think about not having armed  
13 security at all, is that appropriate?

14 A. That would be made up to the corporate  
15 office. I don't make those decisions.

16 Q. You're the property manager?

17 A. That's correct.

18 Q. So what would your recommendation be armed  
19 security or no armed security?

20 A. Armed.

21 Q. And you would vote against not having armed  
22 security?

23 A. Correct.

24 Q. Why?

25 A. They wouldn't be doing -- because if I want

1 unarmed security I can go and get something and say,  
2 hey, I want to be armed [sic] security. I don't have  
3 any training, I don't have no background or nothing.  
4 Unarmed can be anyone. That's what I think of.  
5 Okay.

6 Q. So you're saying that to be an armed  
7 security guard you have to be more professional and  
8 get certified --

9 A. Yes, that's correct.

10 Q. -- or trained or licensed in some way?

11 A. That's correct.

12 Q. I see. And I guess also the fact that  
13 you're armed might help you deter or stop crime?

14 A. I wouldn't say that because the law stops a  
15 lot of that from being able to happen.

16 Q. Okay. What would your views be about not  
17 having security armed or unarmed at all would that  
18 be appropriate?

19 A. I don't give my opinion. I work for a  
20 company and I do what they want me to do, sir.

21 Q. If you had a vote, what would you vote on  
22 that?

23 A. I wouldn't vote.

24 Q. You wouldn't vote?

25 A. No.

1 Q. You would just abstain?

2 A. Yes, sir.

3 Q. Why?

4 A. I don't think -- I don't understand the  
5 question as to why.

6 Q. Well, to me it seems like you're telling --  
7 you're the property manager?

8 A. That's correct.

9 Q. And you're the top person on the ground?

10 A. That's correct.

11 Q. And am I right, you know what's going on at  
12 Seven Courts better than anybody above you on the org  
13 chart, right?

14 A. That's correct.

15 Q. Because you're there every day?

16 A. That's correct.

17 Q. And I understand the company may not give  
18 you a vote, but I'm asking you not your vote, your  
19 opinion.

20 How would you feel about not having any  
21 security armed or unarmed at Seven Courts?

22 A. And I'm not giving an opinion. I'm only  
23 going to state facts.

24 Q. I am going to ask you some questions about  
25 finances --

1 A. Okay.

2 Q. -- and just tell me what you know and don't  
3 know. Okay?

4 A. All right.

5 Q. Obviously Seven Courts is a business --

6 A. Uh-huh.

7 Q. -- that charge money for rent and you spend  
8 money on goods and services, right?

9 A. Yes.

10 Q. What is your role in how many gets collected  
11 and spent at Seven Courts?

12 A. Kind of the middleman, the overseer. I try  
13 to make sure we stay in line with budget as much as  
14 possible. That is part of my role to see that we're  
15 staying in line with budget.

16 Q. And where does that budget that you stay in  
17 line come from?

18 A. Different things have different budgeting.  
19 I'm just going to break them down. You have general  
20 office stuff that would be a category, then you have  
21 maintenance stuff that's a category. Of course, you  
22 have office payroll, maintenance payroll which is a  
23 category on budgeting. And then you have capital  
24 items which is another area on the budgeting. All of  
25 that is done at a corporate level.

1 Q. So are you telling me corporate sets the  
2 budget for Seven Courts and you're responsible for  
3 trying to stay within the budget?

4 A. That is correct.

5 Q. Are you allowed to influence how much the  
6 budget should be for certain items?

7 A. No, sir.

8 Q. And how do you fit physically in your role  
9 as property manager to try to make sure you stay  
10 within the budget you've been given by corporate?

11 A. We have numerous things. We have like  
12 invoice tracker. We have when we put in the bill  
13 it'll alert you, hey, you're over budget. For  
14 example, right now AC units -- can I give an example?

15 Q. Sure.

16 A. AC units -- the property is a little older  
17 so we have Trane units. In newer homes you don't  
18 have that. But to purchase one of those units it's  
19 now \$3,400. That is not in the budget.

20 Q. For a window unit?

21 A. No. It's for the inside/outside compressor  
22 and the inside air handler.

23 Q. Okay.

24 A. But you have to get both of them because the  
25 freon that used to work both of them now has been

1 discontinued. So you have to change both of them.  
2 So for example, something like that is not in the  
3 budget, but it is needed. So if things like that  
4 occur and I know I'm over budget -- most of the time,  
5 they already know Toya get it done, so I get it done.

6 Q. Who at corporate do you work with on budget  
7 issues? What is the name of the human being that  
8 tells you what the budget is for the year?

9 A. Actually we have an accounting department,  
10 and I'm not sure how they do it at corporate. That  
11 would be a Rodrick Harris we question. I'm not in on  
12 that, so I can't even elaborate or tell you how that  
13 is done. But on my day-to-day basis, we do the  
14 accounts payable. We send account payable e-mails.  
15 Jamaile (phonetic) is one of the accountants, and  
16 Eric is the accountant now.

17 Q. Is that Eric Zamora (phonetic)?

18 A. That's correct.

19 Q. What is your understanding of Mr. Zamora's  
20 role in the budget?

21 A. He's the account payroll manager. He is  
22 over all of the money we get in and the money we send  
23 out.

24 Q. All right. So if spent too much or went  
25 over budget on some item for Seven Courts you hear

1 about it from Mr. Zamora?

2 A. No. It would be -- like I said on the  
3 corporate level Rodrick is who I -- so they -- he  
4 probably knows I can call him and talk with Rodrick.  
5 And then Rodrick will say, oh, yeah, I already gave  
6 her the okay and she know about it. We do a monthly  
7 finance report, a variance report every month, so I'm  
8 able to see things. But normally that is not an  
9 issue at that property.

10 Q. Tell me about the variance report. What are  
11 those?

12 A. They do a whole package that's monthly that  
13 they create. We use the variance report and the  
14 balance statement and the income statement because I  
15 actually have to upload it on the AHA portal.

16 Q. The Atlanta Housing portal?

17 A. That's correct.

18 Q. Oh, you have to show Atlanta Housing?

19 A. The finances, that's correct.

20 Q. Because Atlanta Housing has some Atlanta  
21 Housing tenants in your property?

22 A. That's correct.

23 Q. What do you as the property manager do with  
24 the variance report?

25 A. I just answer questions, such as we met



1 budget, why we might have been over budget or we were  
2 in line with budget.

3 Q. Are you allowed to -- I think you answered  
4 this, but I'm going to ask it again to make sure I  
5 understand.

6 Are you as the property manager allowed to  
7 decide what the budget should be on various items?

8 A. No, sir.

9 Q. That's corporate?

10 A. That's correct.

11 Q. I'm going to ask you about cameras.

12 A. Okay.

13 Q. I'm going to ask you about Eye Q.

14 What can you tell me about Eye Q while I get  
15 my next exhibit?

16 A. We were getting cameras. I asked Maggie to  
17 look into the booklet that we use to get vendors out  
18 sometimes if we don't go on Yellow Pages. It's the  
19 apartment association book. They have like a vendor  
20 book that they send out. So she looked in there and  
21 she located some camera people, they came out and  
22 Mr. Eye Q, their rep, he sold me and Rodrick, and so  
23 that was about it.

24 (Exhibit 9 marked for identification.)

25 BY MR. BLOCK:

1 Q. Let me show you Exhibit 9 which is TPI  
2 002615 through 2626.

3 A. Okay.

4 Q. That Exhibit 9 appears to be an e-mail from  
5 -- the top of the e-mail is from you to Mr. Harris  
6 from April 14, 2021 and you're forwarding the Seven  
7 Courts's proposal from Bobby Keith at Eye Q.

8 I guess Mr. Keith is the sales director for  
9 Eye Q you were telling us about?

10 A. Yes, sir.

11 Q. And if we look at the date Mr. Keith sent  
12 you the e-mail with the proposal on April 4, 2021,  
13 right?

14 A. That's correct.

15 Q. And so am I right in understanding in April  
16 of 2021 at Seven Courts you're looking for a vendor  
17 to come install security cameras?

18 A. That's correct.

19 Q. Why were you looking for a vendor to come  
20 install security cameras at Seven Courts in April of  
21 2021?

22 A. I'm not sure of that question. Can you just  
23 repeat the question for me?

24 Q. Why were you in the market for security  
25 cameras at Seven Courts in April of 2021?

1 A. To get new ones. To get more. To get new  
2 ones. We had four and we wanted to get more.

3 Q. Where were the four cameras that you had  
4 before you purchased anything from Eye Q?

5 A. They were just on the -- let me answer this  
6 correctly. Three of them were located on the office:  
7 one facing the pool, one facing the mailbox, one kind  
8 of sit near my window that actually captures the  
9 doorway when you're walking down to the A building.  
10 So those three were attached to the office, and then  
11 there was one attached to the A building for when  
12 people come in they would have to use their swiper  
13 and call the key box.

14 Q. The monitor for those cameras was in the  
15 office, correct?

16 A. Yes.

17 Q. And if I understand correctly from  
18 Ms. Fontaine, the monitor for those cameras was in a  
19 locked part of the office not where you sat or  
20 Ms. Fontaine sat?

21 A. That is correct.

22 Q. And it was not your practice to watch those  
23 cameras in realtime, was it?

24 A. No, not at this location.

25 Q. Okay. I just want to understand like the

1 decision-making to get cameras.

2 Based on your prior testimony it sounds like  
3 somebody above you would have said, Ms. Wynn, go get  
4 bids for cameras?

5 A. No. I just think it was that we had four  
6 and we wanted more. And the company that installed  
7 those four, they were not in business anymore. So we  
8 just got a new company to get new cameras.

9 Q. I'm trying to figure out, how did you-all  
10 get the idea you should get new cameras?

11 A. I don't recall that.

12 Q. Was it your idea?

13 A. I don't recall. I don't recall. Unless you  
14 can show me something in an e-mail, I don't recall  
15 how that came about.

16 Q. At some point you and Ms. Fontaine had the  
17 job to get vendors or bids?

18 A. That's what we did.

19 Q. And Eye Q was the winning bid, if you will?

20 A. Yes.

21 Q. And was there a formal bid process or Eye Q  
22 just seemed like the best vendor?

23 A. We had other vendors, but I think he was the  
24 only one that was very visual. He came to the  
25 property.

1 Q. All right. If you look through this -- we  
2 will go to where they're located later. I forgot to  
3 ask you something before. You said you felt safe at  
4 Seven Courts.

5 Would you feel safe going to the mailboxes  
6 at 9:30 p.m. on a summer evening at Seven Courts?

7 A. Yes. I've even worked until nine o'clock  
8 sometimes. The mailboxes sit right there at the  
9 office and that's where one of the cameras was. That  
10 camera is still there. They uploaded the technology  
11 on the camera, but the same location where the four  
12 was. That camera has always been there.

13 Q. The old cameras, the old four --

14 A. That's correct.

15 Q. -- did they like record?

16 A. Yeah.

17 Q. So there would be a recording of what those  
18 cameras showed?

19 A. Yes. Like when you say "record," I can play  
20 back.

21 Q. Yeah.

22 A. Oh, okay. I just want to make sure I am  
23 answering the question right. It didn't play back a  
24 long time, days. And with them we got what we could  
25 get almost 30 days but I can't -- I'm not sure.

1 Q. How long to your recollection could you go  
2 back with the old cameras?

3 A. I don't want to state this is factual. I'm  
4 just giving a rough, around two weeks.

5 Q. So in other words, with the old cameras if  
6 you came into work at 9:00 in the morning, you should  
7 have been able to pull up tape from what happened at  
8 9 p.m. the preceding night?

9 A. That's correct.

10 Q. About 12 hours ago?

11 A. That's correct.

12 Q. All right. So I want to ask you about if  
13 you flip to page 2623 of Exhibit 9. The page numbers  
14 are in the upper right corner?

15 A. You said 23.

16 Q. Yeah 2623. It says, Property needs analysis  
17 at the top?

18 A. Yes.

19 Q. And I think you told me you met with the  
20 representative from the Eye Q to scope out the  
21 project?

22 A. That's correct.

23 Q. You kind of told him what you need and he  
24 told you what he could sale?

25 A. That's correct.

1 Q. And who was in that meeting with the Eye Q  
2 representative?

3 A. I don't really recall that day, but I'm  
4 going to believe it was me and my assistant Maggie  
5 that contacted him.

6 Q. Okay. And if you look at page 2623 under  
7 Property needs analysis Eye Q wrote: Based on  
8 discussions with on site manager?

9 A. I'm sorry which one?

10 Q. It's 2623. It says, Property needs analysis  
11 at the top?

12 A. Okay. The same one. I thought we went to  
13 another page.

14 Q. Do you have that in front of you now?

15 A. Yes, I do.

16 Q. So under Property needs analysis IQ wrote:  
17 "Based on discussions with onsite management," which  
18 I take it means you Ms. Wynn?

19 A. Okay.

20 Q. The following areas are vulnerable to  
21 intruder/vandalism. Parking lot vulnerable to  
22 intruder/vandalism. Pool vulnerable to after hour  
23 intruder. Trash compactor/dumpster security.  
24 High-rise floor intruder vulnerability. Elevator  
25 intruding vulnerability. Laundry room security.

1 Leasing office security.

2 Do you see that?

3 A. That's correct.

4 Q. And does that accurately reflect what you  
5 would have told Eye Q when you met with them in April  
6 2021?

7 A. This might not be word for word what I told  
8 him. He might have just got some more from  
9 observations from him being on site, but yes.  
10 Overall the laundry room, the leasing office, I was  
11 just basically going off the previous cameras that we  
12 already had and those like as -- this summary that  
13 would show the four cameras that we had. Those were  
14 in the location, so that's the reason why it was  
15 probably mentioned that way.

16 Q. And is it fair to say that you would have  
17 told Eye Q that places like the parking lot and the  
18 pool and the high-rise and elevators were vulnerable  
19 to intruders?

20 A. Not intruders. In the high-rise there is  
21 smoking and they are peeing in the elevator, so not  
22 intruders. That was his word.

23 Q. So they are residents?

24 A. Yes.

25 Q. Not intruders?



1           A. That's right. I need to give lease  
2 violations and every time they are saying it's not  
3 me, that person is telling on me, they are lying.  
4 That's why I said that was his word that he added.

5           Q. Okay. That's for the elevator. But it  
6 looks like he has got three or four different places?

7           A. The laundry room. So the elevator only sits  
8 in the high-rise. We only have one elevator.

9           Q. I just want to ask you is it fair to say  
10 that in April of 2021 various places were vulnerable  
11 to intruders?

12          A. I can't recall that. I really don't  
13 understand the question.

14          Q. Do you think any places at Seven Courts were  
15 vulnerable to intruders in April 2021?

16          A. Like I said, I'm not giving -- I don't have  
17 an opinion on that. I just told you on record that I  
18 felt safe there. I've work there until 9 o'clock.  
19 We have a policy now that we can't -- this been  
20 happened that we really can't come before our  
21 scheduled work time or the corporate office.

22          Q. Do you understand my question? Okay. All  
23 right. Ultimately you accepted Eye Q proposal to  
24 install security cameras, correct?

25          A. That's correct.

1 Q. And you never told Eye Q they were wrong  
2 about the intruder vulnerability did you?

3 A. This was just the scope of Keith, who is the  
4 sales person. We get people that put things in their  
5 term all the time. So no we never address the  
6 wording of intruder, vandalism. No. No, sir.

7 Q. You didn't tell him that he was wrong and  
8 you did not have intruder vulnerability at Seven  
9 Courts?

10 A. I never mentioned that to him. That was his  
11 wording on this paperwork.

12 (Exhibit 10 was marked for identification.)

13 BY MR. BLOCK:

14 Q. Let me show you Exhibit 10, which is a  
15 document that we received from Eye Q --

16 A. Okay.

17 Q. -- via subpoena and it has been provided to  
18 TPI's lawyers. For the record, Exhibit 10 is an Eye  
19 Q Monitoring Statement of Work dated 4/15/2021.

20 Do you see that?

21 A. Yes.

22 Q. If you look at the third page it looks like  
23 you as the customer signed it, Toya Wynn, Property  
24 Manager. Do you see that?

25 A. That's correct. This is an e-Document.

1 Q. Yeah, it's like a docu-sign.

2 A. Yeah, so it was an e-mail. So Mr. Rodrick  
3 had already reviewed it and he gave me the okay to  
4 sign.

5 Q. Right. And if you look at the top it's a  
6 Statement of Work you signed. This is on the first  
7 page. It's actually the very beginning of the  
8 document. It says: This Statement of Work, SOW,  
9 dated 4/15/2021 is between The Partnership Inc.,  
10 customer, and National Video Monitoring Company LLC,  
11 dba Eye Q Monitoring, the company -- so on and so  
12 forth.

13 Right?

14 A. Yes, I see that.

15 Q. So the contract you signed, you're signing  
16 for TPI, The Partnership Inc. with Eye Q, right?

17 A. That's correct.

18 Q. And if you look at I guess let me count  
19 pages with you here one, two, three, four page in  
20 under Schedule 1 where it has -- it lists the service  
21 and equipment and cites his installation?

22 A. Okay.

23 Q. Do you see where it says: Parent company  
24 named The Partnership Inc.

25 A. Yes, I do.

1 Q. Location name Seven Courts Apartments?

2 A. That's correct.

3 Q. And then at the bottom of that section site  
4 contact e-mail, your e-mail twynn@gotpi.org, right?

5 A. No.

6 Q. No. Whose email address is that?

7 A. Not mine.

8 Q. Is it a typo?

9 A. Yes, it is.

10 Q. What was your actual e-mail address?

11 A. It's twynn@gotpi.org.

12 Q. Okay. So it looks like there was a typo  
13 with your contact e-mail.

14 There was an attempt to include Toya Wynn's  
15 e-mail address and somebody dropped an N?

16 A. Okay.

17 Q. I want to ask you, if you go forward a  
18 couple of pages there is a map. I think it's not  
19 even a map. It's an image of Seven Courts.

20 Do you see that?

21 A. Does it have at the ID of 48FOE958 at the  
22 top of it?

23 Q. Yes.

24 A. Okay.

25 Q. I actually would really like it if you can

1 help orient me. I haven't seen too many overhead  
2 images of Seven Courts. I mean Google Earth of  
3 course, which may be what this is.

4 On your copy of the exhibit can you just  
5 draw an X where the front entrance is, like where you  
6 would enter off of MLK?

7 A. Once again did you say the front entrance?

8 Q. The front address is on MLK, right?

9 A. The front entrance, yes.

10 Q. Can you just draw an X for the front  
11 entrance, please?

12 A. [Witness complies].

13 Q. It's there at the top of the page?

14 A. Yes.

15 Q. And then where is the office?

16 MR. MELCHER: What do you want her to mark  
17 that as?

18 MR. BLOCK: Maybe an O for office.

19 BY MR. BLOCK:

20 Q. Is it in the center of what looks to be a  
21 pool?

22 A. The pool is in front of it, yes.

23 Q. So the front door of the office would face  
24 the pool?

25 A. No.

1 Q. Where would the front door of the office be?

2 A. Facing the parking lot and the mailboxes.

3 Q. Going off to the right. I see. And where  
4 are the mailboxes?

5 A. Right here by where I put the circle at the  
6 front door.

7 Q. Can you draw an M for mailboxes.

8 A. [Witness complies].

9 Q. Where is the B building, B, as in bravo?

10 A. I'm going to put a B right here because it's  
11 both.

12 Q. Both of those. And those are off to the  
13 right as we are looking at it?

14 A. That's correct.

15 Q. We have not talked a lot about the Diaz  
16 family today but where would their unit B-23 have  
17 been? And maybe just write B-23 on the map. So for  
18 the record they are at the bottom right of the B  
19 building?

20 A. That's correct.

21 Q. And then the high-rise is that the structure  
22 down at the very bottom? You don't need to mark  
23 anything I'm just trying to get oriented. So looking  
24 at this map, what are the other buildings? We have B  
25 building, the high-rise, and what are the others?

1           A. You have coming into the entrance over here  
2           you have the D building, to the right is the E  
3           building, then you have B building, the office, C  
4           building and A building the high-rise in the back.

5           Q. Where is the playground?

6           A. The playground will be in this area.

7           Q. Down at the bottom where it looks like there  
8           is some dirt?

9           A. No. Off from the high-rise.

10          Q. Okay. So if I look at the map across from  
11          the high-rise there is sort of a greenish rectangle  
12          with brownish almost like baseball infield color?

13          A. That's the playground.

14          Q. Okay. And then it looks like there is a  
15          little parking lot. Is that right?

16          A. That's correct.

17          Q. Looking at this map where are children  
18          allowed to play?

19          A. At the playground only.

20          Q. Why at the playground only?

21          A. TPI that's in their rules and regulations.

22          Q. Why?

23          A. I'm not sure, sir. I don't make those  
24          decisions.

25          Q. Did you enforce that rule?

1 A. That's correct.

2 Q. How would you enforce that rule?

3 A. Send an infraction.

4 Q. Would you physically go up to children who  
5 were playing outside the playground and tell them  
6 they had to go play elsewhere? Never?

7 A. No, sir. I don't recall doing that at all.

8 Q. Were the playgrounds at Seven Courts closed  
9 at any point for COVID?

10 A. Yes, sir.

11 Q. When roughly were they closed?

12 A. I don't recall. I just know that Holt  
13 delivered the fliers. don't recall the date.

14 Q. Who is Hope?

15 A. Holt, Horace Holt.

16 Q. Okay. Holt delivered the flyers. Okay. So  
17 probably in March or April of 2020.

18 It wouldn't have been before then that you  
19 closed the playground for COVID, right?

20 A. I don't recall.

21 Q. Do you remember how long the playgrounds  
22 were closed?

23 A. No, I don't recall that.

24 Q. How did you notify residents that the  
25 playground was open again?



1 A. Once we opened back up the office at the  
2 beginning of this year.

3 Q. So the playgrounds were closed from the  
4 beginning of COVID until 2022?

5 A. Yes, sir. We had notice sent out and had it  
6 taped off, but they decided to take the tape off.  
7 And unfortunately, they just -- I don't have any  
8 other answer to that.

9 Q. Okay. Let's do a few things. Where were  
10 children supposed to play if not on the playground?

11 A. In the TPI Management Service community  
12 rules and regulations that we talked about earlier it  
13 said they must entertain all guests inside their home  
14 only.

15 Q. I'm asking a different question. You  
16 actually told me before that it was TPI's policy not  
17 the new company.

18 But where if not on the playground where are  
19 little kids supposed to play at Seven Courts?

20 MR. MELCHER: Objection, time frame, when.

21 BY MR. BLOCK:

22 Q. While the playground was closed from the  
23 beginning of COVID-ish until 2022, where were the  
24 children supposed to play?

25 A. We didn't have an area. There was no area

1 to play.

2 Q. You said the office was closed. The office  
3 was closed until this year 2022?

4 A. No. We sent a letter out saying the office  
5 was closed for them just walking up. They had to  
6 have appointments only.

7 Q. So you actually were in Atlanta office?

8 A. That's correct.

9 Q. Except maybe there was a time you were out  
10 because everybody was doing 15 days for COVID and  
11 that went for a little bit?

12 A. No, sir. We worked every day.

13 Q. Oh, you didn't. Good for you. So there was  
14 a human being, namely you in the office during much  
15 or all of COVID, but residents were not allowed to  
16 just walk into the office?

17 A. That's correct. They had to do appointments  
18 only.

19 Q. How would they make appointments?

20 A. Call the phone.

21 Q. What if you were not there?

22 A. They would leave a message and we contact  
23 them back through e-mail. We also have on the door  
24 that they can go on the Web site and they can pay  
25 their rent and to do a work order.

1 Q. What if someone walks up and knocks on the  
2 door during this period the office was technically  
3 closed -- could someone knock on the door and speak  
4 to you about an issue?

5 A. No. They did it often though.

6 Q. What would you do if someone -- let's say  
7 middle of 2021, summer, someone had a problem with  
8 something at Seven Courts could they just walk up and  
9 knock on the door and speak to you about it?

10 A. No, sir.

11 Q. Why not?

12 A. Because the rules are the rules. We did not  
13 take walk-ups, they had to call.

14 Q. How would you communicate to someone who  
15 walked up that they couldn't speak to you?

16 A. We had a sign that said we were closed. We  
17 have a glass door, we had blinds that we pulled down,  
18 and they would still just bang on the door.

19 Q. Give me an example of someone that walks up,  
20 knocks on the door, summer of 2021, someone has a  
21 problem and they're knocking on the door and let's  
22 say they make eye contact with you, what would you  
23 do?

24 A. Nothing. I'm mainly staying in my office  
25 because we have a lot of work to do.

1 Q. If you made eye contact with this person  
2 would you --

3 A. No, sir.

4 Q. -- gesture?

5 A. Sometimes yeah, we're closed. That's it.

6 Q. You wouldn't step outside and help them with  
7 their problem?

8 A. Now sometimes like I said they have glass  
9 and if they are banging on the glass hard enough yes  
10 I will come because I didn't want the glass to be  
11 shattered. So yes, and I would ask what's going on,  
12 and then I would most likely point to the sign that's  
13 also on the glass saying they can go to Seven Courts,  
14 they can put in a work order or they can pay their  
15 rent. And they're just at the door and still at the  
16 door a long time though. You can go to  
17 sevenscourtapartments.com and you're able to pay your  
18 rent and do a work order where they don't have to  
19 come to the door.

20 Q. Did you -- do you now or at any point as a  
21 property manager, what was the system you would use  
22 to keep track of tenant complaints or concerns?

23 A. That also is on there.

24 Q. On the Web site?

25 A. That's correct.

1 Q. If someone wanted to say, hey, my toilet is  
2 not working, they'd use the Web site?

3 A. They use the Web site or they'd call us or  
4 they would e-mail at sevincourt@gotpi or twynn@gotpi  
5 or Maggie Fontaine, you know, they'd get our e-mail.  
6 Sometimes when people come -- like I said, we were  
7 still open. So they know if they wanted something  
8 they would call, they would say I'm going to come  
9 down. It could be 11 o'clock and say, hey, I want to  
10 pay my rent. I'll be there at 2 o'clock. Okay.  
11 When they'd come at 2 o'clock, they would say  
12 whatever they had, if they had a work order issue or  
13 any concerns and we would write it down and put it in  
14 their file.

15 COURT REPORTER: When you have a breaking  
16 point, can I have a break?

17 (A discussion ensued off the record.)

18 BY MR. BLOCK:

19 Q. Back on the record. So Ms. Wynn, can you go  
20 back to Exhibit 10. The first page of Exhibit 10.  
21 In the middle of the first page it says: Estimated  
22 installation start date, estimated four to six weeks  
23 from contract execution once deposit and first month  
24 lease payment received.

25 Do you see that?

1 A. That's correct.

2 Q. And then estimated installation completion  
3 date under that is approximately 2 to 3 weeks once  
4 installation begins, right?

5 A. That's correct.

6 Q. And then estimated monitoring services start  
7 date is within 24 hours of installation completion,  
8 right? Is it fair to understand that at least when  
9 you signed the Statement of Work on April 15, 2021,  
10 the assumption was that assuming you all signed and  
11 paid right away that you would have the cameras from  
12 Eye Q up and running in about two months?

13 A. I don't -- from what this paper is saying  
14 that's what it says. Yes, sir.

15 Q. It looks like once you sign and pay it's  
16 four to six weeks before installation, and then two  
17 to three weeks of installation work and 24 hours to  
18 turn on the cameras. So call it six to nine weeks  
19 from signing and payment to going live with the  
20 cameras, right?

21 A. Compared to this document I'm looking at,  
22 yes.

23 Q. Yes, I'm just asking you about this. That's  
24 not what happened is it?

25 A. No.

1 Q. Can you tell me why?

2 A. I don't recall.

3 Q. We have some interrogatory responses. It's  
4 a legal document that we ask questions to TPI and TPI  
5 gives answers under oath as the company?

6 A. Okay.

7 (Exhibit 11 was marked for identification.)

8 BY MR. BLOCK:

9 Q. And those say that -- I can mark them, but  
10 those say -- let me just mark these for the record so  
11 we have it all clear. These will be Exhibit 11.  
12 Just on the front it says, The Partnership Inc. First  
13 Amended Answers to Plaintiff First Set of  
14 Interrogatories. I really want to ask you about  
15 something that is on the bottom of page 5 onto 6. I  
16 will give you a copy of course. I'm just trying to  
17 show you.

18 What TPI told us in these amended  
19 interrogatory responses is that security cameras are  
20 now live. Partial security camera utilization was  
21 put in place on October 1, 2021 and the remaining  
22 cameras went live on November 1, 2021. And I think  
23 that's in reference to the Eye Q cameras?

24 A. Okay.

25 Q. And so you don't have any reason to disagree

1 with the company's testimony in interrogatories that  
2 the Eye Q cameras weren't live until October,  
3 November 2021?

4 A. No, sir.

5 Q. And I think you just told me, you can't  
6 recall sitting here today why it took from April 2021  
7 when you can signed the Statement of Work until  
8 October, November of 2021 for the Eye Q security  
9 cameras to go live?

10 A. That is correct.

11 Q. What, if anything, did you do to fill in the  
12 gap for that seven-month period by way of security  
13 measures?

14 A. I don't recall.

15 Q. If you go back to Exhibit 10, which is the  
16 Eye Q Statement of Work, in the middle under customer  
17 information it says, Hours monitored 7 p.m. to 4 a.m.  
18 daily. Do you see that? It's in the middle right in  
19 here I'm pointing.

20 A. I see -- okay 7 a.m. to 4 a.m. daily.

21 Q. Whose decision was it to have the cameras be  
22 monitored 7 p.m. to 4 a.m. daily?

23 A. Me and Mr. Rodrick.

24 Q. Why did you and Mr. Harris choose 7 p.m. to  
25 4 a.m. daily?



1           A. Because that is after the office is closed  
2 and this is basically talking about the monitoring  
3 for people dumping trash and stuff and the loitering  
4 that's going on in the A building where the elevator  
5 is. That was why, but I don't recall what made us  
6 specifically pick 7 p.m. to 4 a.m.

7           Q. I have heard about this from several people.  
8 Tell me about the situation with trash dumping that  
9 was bothering you all at Seven Courts. What is that  
10 situation?

11          A. I actually had court on January 20th. Yes.

12          Q. For what?

13          A. This code enforcement. We sit on Martin  
14 Luther King and we don't have gate. So they come up  
15 and down the street. We have a hotel that sits on  
16 the left of us and we have a hair salon that sits on  
17 the right, and then we have the dumpster. They dump  
18 all kind of things from tires to furniture. So yes,  
19 that was a lot. And we also had got the video so  
20 they can try to deter contractors that come on the  
21 property and dump their trash, such as tires because  
22 you have to dispose of them. And we have to pay  
23 extra to get them disposed.

24          Q. So it sounds like illegal dumping is a major  
25 problem for you all at Seven Courts?

1 A. Not really. But we don't have a gate so it  
2 happens.

3 Q. Well, it's significant enough that you pay  
4 to put security cameras on the dumpsters, right?

5 A. Yes, to try to deter them. We actually have  
6 it where they can talk to them at the certain  
7 location.

8 Q. Oh, the person who's watching the monitor?

9 A. That's what I'm trying to explain. That's  
10 why I'm thinking that that monitoring from 7 p.m. to  
11 4 a.m. was. It's not the cameras just during that  
12 time, but for them to talk and tell the residents in  
13 the A building not to be loitering in the hallway,  
14 not to urinate, not to smoke, not to hold the  
15 elevator. They'll try to hold the elevator. So it  
16 was a lot going on with that building. And it just  
17 so happens that the maintenance shop is also hooked  
18 up to that building and outside of that is where the  
19 trash compactor is.

20 MR. BLOCK: Why don't we take our break  
21 here.

22 (A short break was taken.)

23 BY MR. BLOCK:

24 Q. Back on the record.

25 Ms. Wynn, let me go back to earlier to your

1 testimony about how friends of yours have companies  
2 that may have performed services for Seven Courts.

3 Can you give us a list of those companies?

4 A. No, I wouldn't -- I don't have a list.

5 Q. You don't remember the names?

6 A. They work there like doing AC things,  
7 plumbing. Pete the plumber works there now.

8 Q. And is Pete the plumber a friend of yours?

9 A. Yeah. He has worked with me on all the  
10 properties basically I've worked at. That's how we  
11 got this relationship.

12 Q. Are there any other companies or vendors  
13 that you remember right now where you say you have a  
14 friendship outside of --

15 A. Not -- I know Pete the plumber. The pool  
16 man, he does the pool. Yeah.

17 Q. The pool man is a friend of your outside of  
18 Seven Courts?

19 A. Yes.

20 Q. And the name of the company is the pool man?

21 A. It's Dominique Water Boy.

22 Q. I have seen Water Boy on the invoice?

23 A. Like I said, I just try to help them, like  
24 doing the invoice. They have paperwork and stuff,  
25 they take forever to submit the invoices. And we

1 work off an accrual basis. So sometimes they are not  
2 doing their job holds me up. So that's why I said, I  
3 don't get any money from them. I just want them to  
4 send me the invoice so Eric can stop asking me for  
5 the invoice. That's it. But nothing -- I don't get  
6 any money from them.

7 Q. If we think about relatives of yours who  
8 have lived at Seven Courts could you give me their  
9 names?

10 A. Yes, I gave you one. That's the only  
11 relative I have Tasharah Wright.

12 Q. One reason we are asking these questions is  
13 TPI redacted a bunch of the names in the reports, so  
14 we don't know who the people involved in the incident  
15 were. Your daughter she didn't live at Seven Courts  
16 but she was there sometime. What is her name?

17 A. I don't know why I would have to answer  
18 that.

19 MR. MELCHER: Her sister's name is that what  
20 you're asking?

21 MR. BLOCK: Her daughter.

22 THE WITNESS: I gave him my sister's name  
23 and she's on the lease. My daughter is not.

24 BY MR. BLOCK:

25 Q. I will explain why because I understand it

1 might make you uncomfortable but there is a large  
2 number of incidents reports. You know incident  
3 reports are like when there is a reported incident of  
4 some kind at Seven Courts. There are also plenty of  
5 e-mails from Mr. Holt, some from Mr. Hickey  
6 describing misconduct at various times or alleged  
7 misconduct at various times at Seven Courts. And we  
8 not knowing who the redacted people are and not  
9 knowing your daughter's name, we can't tell if it was  
10 your relatives who were involved in the misconduct.  
11 And I have to tell you whether it's true or not, it's  
12 something that people have said and it's something we  
13 have to explore. So that's why we want to know her  
14 name, not because we want to go any further than  
15 that.

16 THE WITNESS: Can I talk to you about this?

17 MR. MELCHER: There is a question on the  
18 table. But let me just advise you that there is  
19 a confidentiality agreement as well and I don't  
20 think it's leaving this room in terms of what  
21 your daughter's name is.

22 THE WITNESS: Okay.

23 MR. MELCHER: So I don't think that you have  
24 anything to fear from the people sitting here.

25 THE WITNESS: But I need to speak with you.

1 MR. MELCHER: Okay. Is that okay?

2 MR. BLOCK: Yeah. You need to go off the  
3 record?

4 THE WITNESS: Yeah.

5 MR. BLOCK: Madame Court Reporter, we're  
6 going to go off the record.

7 (A short break was taken.)

8 THE WITNESS: My daughter name is N-Kiya.

9 BY MR. BLOCK:

10 Q. Thank you. And I'm sorry I asked you that.

11 A. And the reason why is because she had ran  
12 away. That's why I didn't know and that's the thing.

13 Q. Well, I'm really sorry to hear that. I hope  
14 she comes back safely.

15 A. No, she's back, but during this time she ran  
16 away. Yes. And I don't have custody. Okay.

17 Q. All right. We will move well away from that  
18 and thank you. I want to ask you about the  
19 circumstances of this case and the Diaz family. And  
20 I don't know how you knew them but their proceeding  
21 is the Diaz family, which is why I said the Diaz  
22 family. Of course, you can also call them Medrano or  
23 Caceres. I think in the lease maybe it was Medrano  
24 or Caceres. You know who I'm talking about?

25 A. Yes, sir.

1 Q. Okay. What can you tell me about the Diaz  
2 family in general?

3 A. They were residents. They didn't really  
4 follow the rules that much, but that's it. They had  
5 some financial difficulty. People had told I think  
6 Maggie that they were having a bible study. I really  
7 didn't interact with them that long. I had been  
8 helping Rodrick on other properties, so I really  
9 wasn't at Seven Courts full-time during the pandemic.  
10 I had been helping him with the other properties.  
11 Some of the properties that Mr. Holt would work.

12 Q. Whispering Pine?

13 A. Well, Whispering Pine -- a lot of the  
14 properties were in Griffin.

15 Q. Griffin, Georgia?

16 A. Yes. I want to say along Gainesville,  
17 Greenville. I can't think of the other.

18 Q. Is that Georgia?

19 A. Yeah. I know it's near Newnan. I just  
20 can't remember right now. I'm kind of thrown off  
21 from the previous question.

22 Q. What are the rules that you believe the Diaz  
23 family did not follow?

24 A. Loitering, standing, working on their car  
25 outside in the parking lot, the children not playing

1 at the playground, playing with -- I think they had a  
2 [unintelligible] and then they had a basketball and  
3 that's it. But working on the car. I know they  
4 worked on the car and the children were not  
5 supervised. And also the things we have on the  
6 infractions.

7 Q. I'm sorry.

8 A. That's okay.

9 Q. Where would you rank working on your car in  
10 the parking lot and having kids, you know, kind of  
11 unfortunate at that time playing unsupervised as you  
12 stated.

13 Where does that rank on the scale of  
14 misconduct that you see at Seven Courts?

15 A. Just the ones that don't follow direction.  
16 I'm sorry I'm not sure of the question.

17 Q. That's fine. What else do you remember  
18 about the Diaz family?

19 A. That's basically it. They had rent help and  
20 they had bible study. I don't remember too much on  
21 the Diaz family.

22 (Exhibit 11A was marked for identification.)

23 BY MR. BLOCK:

24 Q. I intended to ask you about the rules and  
25 regulation before, so let's do that now. I am going



1 to mark as Exhibit 11 TPI 000492 through 496. I will  
2 hand you your copy and your counsel his copy. This  
3 document is entitled TPI Seven Courts Apartments  
4 Community Rules and Regulations, right?

5 A. That's correct.

6 Q. And if you look at the very last page it  
7 says: This addendum is hereby made a part of the  
8 executed lease by Edwin Medrano Caceres and Elsa  
9 Flores on October 15, 2020 for apartment hom B-23.  
10 And it looks like they signed it.

11 Somebody signed it under management  
12 signature. Do you recognize that signature?

13 A. Yes.

14 Q. Is that Ms. Fontaine's?

15 A. That's correct.

16 Q. That does look like a MF to me. Okay. When  
17 you talked about the rules and regulations is this  
18 what you're referring to Exhibit 11?

19 A. And also the GAA Community Rules and  
20 Regulations.

21 Q. GAA Community Rules and Regulations?

22 A. And this was the TPI one I referred to  
23 earlier. And if you look at number -- go up under  
24 number 11.

25 Q. Okay.

1 A. That's what we were talking about earlier  
2 when you asked me where they should be and that's  
3 what it says.

4 Q. okay. What it says under Common Areas is:  
5 The use of the clubhouse, fitness center, computer  
6 lab, swimming pool and all other amenities are for  
7 exclusive use by community residents and their  
8 authorized agent. Okay. That doesn't say kids can't  
9 play in the front area or limited to playground, does  
10 it?

11 A. 11 on Loitering.

12 Q. Oh, not common areas. Okay. 11 Loitering:  
13 Management will not allow residents or their visitors  
14 to congregate on steps or breezeways or other common  
15 areas at any time. Please entertain guests inside  
16 the apartment home only.

17 Is that what you're referring to?

18 A. Yes.

19 Q. Tell me how you interpret number 11 the  
20 Anti-Loitering policy?

21 A. From their cars to go into the apartment.  
22 They shouldn't be outside.

23 Q. Okay. So if you saw a tenant outside what  
24 would you do?

25 A. An infraction.

1 Q. A written infraction?

2 A. If they are outside working on their cars,  
3 they get an infraction. If they are outside just  
4 congregating, they get an infraction. If you're  
5 outside trying to bring your car to the door and  
6 you're taking groceries in, you're moving. So that's  
7 why it's up under loitering because you're standing,  
8 not just standing there congregating.

9 Q. What was the problem for you with little  
10 children playing outside not at the playground?

11 A. Not at the playground.

12 Q. Yeah. Why was that a problem?

13 A. I'm not sure they put these rules in place.

14 Q. TPI?

15 A. Yes.

16 Q. If you came across residents who were  
17 outside in your view loitering, you told me you'd  
18 send an infraction notice, but that means you go back  
19 to your office and generate a piece of paper that  
20 someone delivers to them in their mailbox, right?

21 A. Yes.

22 Q. Would you also sometimes go up to the tenant  
23 or speak to them and tell them you're loitering, you  
24 have to go inside, something to that effect?

25 A. So if I'm outside just like I told you I

1     seen Mr. Holt. Sometimes I'm walking the property  
2     because we have to get out. The way the building,  
3     the structure is you can see that, the outside  
4     perimeter. You can't see the inside perimeter where  
5     they put trash and stuff on the back porch. So if  
6     I'm outside and they're out there, then yes, I will  
7     tell them. But if the kids are in the back of the  
8     courtyard -- and that's what I have tried to tell  
9     them to go in the back and not in the front -- then I  
10    don't really say anything to them.

11             Yes, if I walk by and see them working on a  
12    car -- me and Maggie have approached, we're going to  
13    tell them you can't do that. If they are outside  
14    loitering by the trash can, which they like to do, we  
15    will tell them; but normally that's secure. It  
16    really doesn't happen until in the evening time when  
17    they don't want to follow the rules.

18             Q. How are infraction notices delivered?

19             A. By security.

20             Q. Not by you?

21             A. No, not by me. Sometimes if security is not  
22    there we will have the maintenance do it or the  
23    grounds person.

24             Q. Why is it that security typically would do  
25    it?

1           A. Because it helps us to be able to pinpoint  
2     what they sent out because they put it in the report.  
3     Hey, we put this notice out. What Holt would do at  
4     first he would take a picture of the door, so we  
5     would know like late payments just to have proof in  
6     court that we actually sent the notice.

7           Q. So let's go back to the Diaz family. What  
8     else do you remember about the Diaz family?

9           A. I don't remember much. They wouldn't really  
10    communicate with me.

11          Q. Do you know whether -- you obviously know  
12    about the July 2021 armed robbery?

13          A. Yes.

14          Q. Prior to that, did it ever come to your  
15    attention that the Diaz family -- did they ever  
16    report that they had been the potential victims of  
17    other potential crimes?

18          A. No.

19          Q. Specifically did it ever come to your  
20    attention that the Diaz family had reported that a  
21    man broke down their door during bible study?

22          A. No.

23          Q. Did it ever come to your attention that the  
24    Diaz family reported that someone tried to break in  
25    the window of their apartment?

1 A. I don't recall.

2 Q. What would you have done if you had heard  
3 about either of those incidents?

4 A. I don't know. Like I said before, I don't  
5 go off of -- okay, I'm going to just give you facts.  
6 When I did hear something happened to them, me and  
7 Maggie went down there that day. Once we opened I  
8 went down there, just like I do with everybody else.  
9 If something comes to my desk I try to talk to them,  
10 you know, a resolution.

11 I actually had told them, they can go and  
12 purchase a ring camera and I would take it off their  
13 rent. The children were in there at the same time  
14 that when we talked at the door. They really didn't  
15 communicate too well so the daughter came.

16 Yeah. I just went there just to find out.  
17 I wanted to get details to see if they knew somebody.  
18 If they had seen stuff. Because from what Mr. Hickey  
19 said, he wasn't there, and I just didn't know if they  
20 knew the person.

21 I thought maybe if a familiar face, me and  
22 Maggie going over there, if they would feel  
23 comfortable talking to Maggie maybe they could say,  
24 hey, we seen this person. That was it. But they  
25 both told me that they didn't know. I also referred

1 them to Rainbow Housing -- because I knew in previous  
2 times they had had financial difficulty -- to help  
3 them pay their rent because they said they got robbed  
4 of \$3,000.

5 Q. Did you believe them?

6 A. I don't recall that day if I did or not.

7 Q. Sitting here today do you believe them?

8 A. No.

9 Q. Why not?

10 A. Because I don't know who would keep that  
11 type of money on them during this time and because  
12 they always needed rent help.

13 Q. So you think they are lying about being  
14 robbed of \$3,000?

15 A. Yes.

16 Q. Do you think they are lying about being  
17 robbed?

18 A. I think they were lying about being robbed  
19 for \$3,000.

20 Q. So I want to understand. Do you think they  
21 were robbed at gunpoint ?

22 MR. MELCHER: Her personal opinion?

23 MR. BLOCK: Yeah, give me your personal  
24 opinion please.

25 THE WITNESS: No. I don't think they were

1 robbed. I don't. But I never showed them that.  
2 That's why I was saying on that day I never  
3 showed that. I showed caring and I was very  
4 helpful, supportive, telling them to get the  
5 ring camera. Because if you're having bible  
6 study then, you know, take precautions of  
7 certain things -- a camera inside. I don't  
8 know. I don't know. But no, I don't think so.  
9 I don't think they were robbed.

10 BY MR. BLOCK:

11 Q. You think those little kids are lying?

12 A. I mean, I don't know if the little kids are  
13 even saying it at this point.

14 Q. When you spoke to the Diaz family the night  
15 after they were robbed, did you tell Mr. Senor  
16 Caceres that he should get a gun?

17 A. No, sir. No, sir.

18 Q. Now your tone just changed with me.

19 A. Because that is like ridiculous. I told him  
20 to get a ring. Like I told you, they don't  
21 understand, so no.

22 Q. The little kids speak English just fine.

23 A. Why would I tell someone to get a gun?

24 Q. Well, you have a gun.

25 A. I know. I have a gun for personal reasons.



1 Q. To keep you safe, right?

2 A. No.

3 Q. Well, what do you intend to do with it?

4 A. My personal reasons.

5 Q. We don't need to debate. What do you mean  
6 there?

7 A. Because I have a vehicle, and I have been  
8 attacked in my vehicle. I have a Dodge Challenger.  
9 It's been robbed, I have been shot at, so there you  
10 go. That's why. They're personal reasons, sir.

11 Q. Did you tell the Diaz family they should  
12 move for their safety?

13 A. No, sir.

14 Q. Do you think they would have been safe if  
15 they remained at Seven Courts?

16 A. Yes, sir.

17 Q. Do you have any hypothesis about who robbed  
18 the family?

19 A. No, sir. That's why I tried to go and talk  
20 to them to try to figure out if they knew. You know  
21 if you go talk to people they sometimes slip up and  
22 say things. And that's what he did. He was like,  
23 you know -- that's how I learned about the bible  
24 study other than the residents telling me. He  
25 actually mentioned it.

1 Q. Who is he?

2 A. The father.

3 Q. He mentioned the bible study?

4 A. Yes. And he was showing me where his  
5 computer was and where he did everything. He was  
6 talking about Facebook. And I was telling him that,  
7 you know, you have to be mindful. You can't have  
8 those things. I said, and if you're going to do the  
9 Facebook, let them see the camera. Let them see  
10 that. But no, never no gun. No, sir.

11 Q. So a tenant has never moved out for safety?

12 A. No, sir.

13 Q. So do you think that there is a hypothesis  
14 here that somebody from the bible study or he saw a  
15 bible study online decided to go rob them?

16 A. Uh-huh. I think they made themselves a  
17 target, if they did get robbed. I don't think it was  
18 like a random thing, if they were robbed.

19 Q. Before we turn to rent, did you ever say  
20 anything racist or discriminatory to the Diaz  
21 children?

22 A. No.

23 Q. Did you ever tell them, the kids, the Diaz  
24 children that they couldn't play on the playground  
25 because the playground was not for Hispanics it was

1 only for Americans?

2 A. No.

3 Q. Did you ever tell the Diaz children that  
4 they, who are Hispanic, that they had to go inside  
5 and leave the playground while letting African  
6 American kids stay on the playground?

7 A. No, sir. Like I told you before, I try to  
8 put it in writing and the infractions are the same.  
9 They have several infractions in their file for  
10 working on cars, playing. So that could be why they  
11 are saying things but not literally verbally. They  
12 are talking about paperwork.

13 Q. Have you ever threaten to call immigration  
14 on any tenant at Seven Courts?

15 A. No. No.

16 Q. Have you ever uttered the word immigration  
17 at Seven Courts?

18 A. No. No, sir. Actually the company that I  
19 have right now those are my friends. No, sir.

20 Q. Why would people say those things about you?

21 A. This is my first time ever hearing these  
22 things. I have never heard these things before.

23 Q. Why would the Diaz family say that you said  
24 racist things about them?

25 A. I'm not sure. Why would they say they got

1 thing robbed? I'm not sure.

2 Q. Why would Mr. Holt say he saw you threaten  
3 to call immigration on this family?

4 A. Because Mr. Holt clearly does not like me.

5 Q. And that's why he chose to say it because he  
6 doesn't like you?

7 A. Exactly.

8 Q. Who is in charge of -- at Seven Courts who  
9 is in charge of determining how much a tenant is  
10 going to pay in rent?

11 A. That is based off the home rent approval  
12 sheet. So AHA has to approve it, and then DCA  
13 approves it.

14 Q. Who is DCA?

15 A. Department of Community Affairs I believe.  
16 Don't quote me on that.

17 Q. A Georgia state agency or a local agency?

18 A. Yes, Georgia Department of Community  
19 Affairs.

20 Q. A government agency of some kind?

21 A. Yes.

22 Q. It's not HUD?

23 A. That's correct. No, I think they are a part  
24 of -- I know it's the financial, but I'm not going to  
25 say it's not HUD. I'm not going to say that.

1 (Exhibit 12 was marked for identification.)

2 BY MR. BLOCK:

3 Q. That's okay. It's a complicated structure.

4 Let me show you Exhibit 12, which is TPI  
5 000575 through 581. For the record Exhibit 12 is a  
6 mid month checklist for Seven Courts dated 5/17/21.  
7 Do you see that?

8 A. Yes.

9 Q. We discussed this document with Ms. Fontaine  
10 and she initialed this or all of these items on this.

11 Are you familiar with a mid month checklist  
12 for Seven Courts?

13 A. That's correct.

14 Q. What are these?

15 A. It's basically getting us prepared for the  
16 end of the month, but like in the middle of the month  
17 we want to check to make sure we didn't miss to move  
18 anybody in, we didn't miss moving nobody out, we  
19 haven't not charged people that needed late fees.  
20 It's just like an overview to make sure in the middle  
21 of the month that we are on task.

22 Q. If you keep going a couple of pages in you  
23 see a spreadsheet entitled Gross Potential Rent and  
24 it lists all of the units and the market rent,  
25 potential rent and the actual rent charge. Do you

1 see that?

2 A. That's correct.

3 Q. All of these names are redacted except for  
4 one which is B-23 Edwin Medrano Caceres. It should  
5 be on -- it's on TPI 578. Do you see that? It's  
6 page 2 of that spreadsheet.

7 A. Okay B-23.

8 Q. That's Senor Caceres, father in the Diaz  
9 family. And if you look under the actual rent charge  
10 their rent -- and this was for 2021 was \$1,200 a  
11 month, correct?

12 A. Yes. That's correct.

13 Q. And I recognize that you have different  
14 sized units at Seven Courts. If you scan the market  
15 rent column, do you see for the Diaz family their  
16 market rent was 1,265 a month and on that page alone  
17 there were three other units that were market rent  
18 for 1265 a month. And you can find others throughout  
19 the spreadsheet. If you look at the Caceres one for  
20 their actual rent they were paying \$1,200 a month.  
21 Do you see that?

22 A. Uh-huh.

23 Q. And you can look, you're not going to find  
24 anyone else who was paying \$1,200 a month in 2021.  
25 And I will give you a minute to do that, but I'd like

1 you to tell me why was the Diaz family being charged  
2 more than anybody else at Seven Courts?

3 A. They probably were the last four bedroom  
4 that came in up under this 60 percent.

5 Q. Explain what you mean.

6 A. So we have 30 percent, 50 percent and 60  
7 percent. I'm just going to give an example. These  
8 prices won't be the correct prices because I'm giving  
9 an example. So for a four bedroom, you can have have  
10 \$200 for 30 percent. But if you're a one person  
11 household with one person, you can only make 13,000  
12 and be able to get a four bedroom for 200. If you're  
13 50 percent, you can be a one person household and you  
14 can make up to 30,000 and your rent will be 500. If  
15 you're at 60 percent, you can make a maximum of  
16 40,000 and your rent will be 700.

17 The rents are changed every year in April,  
18 and then they are approved in October. So they must  
19 have came in after we got the home rent approval and  
20 that's the reason they were probably paying more.  
21 But I can tell you now there are a lot of people  
22 paying more than that now.

23 (Exhibit 13 was marked for identification.)

24 BY MR. BLOCK:

25 Q. Let me show you Exhibit 13. It's actually a

1 document we produced. You all have not given a copy  
2 of this. It's Diaz 00056 through 63. And it is a  
3 copy of the apartment lease contract between the Diaz  
4 family and Seven Courts from November 1, 2019. So  
5 this was their first year?

6 A. What was this one?

7 Q. That's 2021, so you can set that aside.

8 A. Okay. So we went to a different year now.

9 Q. Yes. This is when they first moved in 2019.  
10 If you look on the first page under paragraph 6, Rent  
11 and Charges, the rent is \$1,100 a month?

12 A. Yes, sir.

13 Q. And if you flip to the last page, who signed  
14 it? I believe that's your signature on 11/1/2019?

15 A. Yes. I don't sign when they're there. The  
16 manager is the only person responsible. So I didn't  
17 do this with them. I probably wasn't there and then  
18 the next day I signed it and she gave them a copy.  
19 But I didn't move them in. That's what I'm trying to  
20 say.

21 Q. That is your signature?

22 A. That is correct.

23 Q. And for the record, if you look at paragraph  
24 44, the name and address of the company or party  
25 authorized to manage the apartment community is The



1 Partnership Inc., right?

2 A. That is what it says.

3 Q. And below that the name and address of the  
4 company or party authorized to receive notice or  
5 lawsuits is The Partnership Inc., correct?

6 A. That's correct.

7 Q. So going back to the rent. It's \$1,100 a  
8 month according to the rent. And is that what they  
9 paid for rent in their first tenancy year beginning  
10 late 2019?

11 A. I'm not sure. Do you have any documentation  
12 that I can look and verify for you?

13 (Exhibit 14 was marked for identification.)

14 BY MR. BLOCK:

15 Q. I will show you Exhibit 14, which is TPI  
16 000460 through 461. This document Exhibit 14 is  
17 entitled, Resident Ledger, and it's dated 10/19/2021,  
18 which it looks like when you all pulled it after  
19 after we filed suit. If you look at the date and the  
20 charges for that first tenancy year beginning  
21 November 1, 2019 the rent is actually listed as  
22 \$1150. Do you see that?

23 A. Yes.

24 Q. And if you look at the charges going on down  
25 the line for the rest of that first year the charges

1 are \$1,150 never the \$1,100 that is on the rental  
2 agreement you both signed?

3 A. This must be one rental agreement. They  
4 probably had another one. Like I said, this is in  
5 November. We get the approved rent, she probably  
6 printed off the wrong one, and then had them get the  
7 correct one.

8 Q. So you think that --

9 A. This is just another one.

10 Q. When do you get your approved rent?

11 A. October.

12 Q. If you look back at Exhibit 13 it's dated  
13 November 1, 2019?

14 A. That's what I'm explaining.

15 Q. It says \$1,100. So you're telling me the  
16 rent should have gone up in October?

17 A. I'm telling you we use -- what's it called?  
18 -- Blue Moon. We use the Blue Moon system to do the  
19 leases off this National Apartment Association. We  
20 just put the information in, so it probably printed  
21 out wrong because they had the old information in  
22 there, and then she re-typed up the new lease. They  
23 most likely have another lease stating the 1,150.  
24 I'm pretty sure because they got rent help.

25 Q. They had what?

1 A. Rental help. Yeah. They had rental  
2 assistance.

3 Q. I will tell you, I don't think we've seen  
4 it. We've seen a lease for that second year?

5 A. Gotcha.

6 Q. Starting in late 2020 through 2021 at  
7 \$1,200. We have not seen a lease for 1,150?

8 A. That's what I'm saying, they probably don't  
9 have it. They probably lost it, I'm not sure. This  
10 is more than what the lease is and they were paying  
11 it and they knew about it.

12 Q. Well, I'm saying your company was charging  
13 them more than what is in the Lease Agreement?

14 A. No. They knew what they were paying.  
15 That's why I'm telling you this. This is all put in  
16 a system. So if she put it in -- we're people. We  
17 are humans. So we put it in and she probably  
18 overlooked it. Like I told you, the prices go up.  
19 She probably entered the wrong price, they probably  
20 had this and then she fixed it because they were  
21 paying it. As you can see, they never paid 1,100.  
22 They paid what they were supposed to pay. So it must  
23 have been an error and they don't have the correct  
24 lease.

25 Q. Do you think there is a lease somewhere that

1 TPI would have that would show --

2 A. 1150, correct.

3 Q. And we just have not been given a copy of  
4 that in the litigation?

5 A. That's what I'm saying.

6 Q. Obviously if you don't have a lease you  
7 can't charge people more than what is on the lease?

8 A. I got you.

9 MR. MELCHER: Objection to form. Go ahead.

10 THE WITNESS: I got you. I understand what  
11 you're saying.

12 (Exhibit 15 was marked for identification.)

13 BY MR. BLOCK:

14 Q. So you mentioned this before. This is going  
15 to be Exhibit 15, which is TPI 000474. This for the  
16 record is -- I believe this is the cancellation  
17 notice that you sent to Mr. Holt the first time that  
18 you all let Mr. Holt go, right?

19 A. Yes, sir.

20 Q. And it's dated October 1, 2020?

21 A. Uh-huh.

22 Q. It's on TPI letterhead, right?

23 A. That's correct.

24 Q. You list your title as Latoya Wynn, Property  
25 Manager, Seven Courts Apartments, The Partnership,

1 Inc., right?

2 A. That's correct.

3 Q. Not TPI Management Services LLC, right?

4 A. That's what this paper says. Correct.

5 Q. Yeah. Why wouldn't you have sent that on  
6 TPI Management Services LLC letterhead?

7 A. I don't understand the question.

8 Q. We will leave that for a little later.  
9 Going back to the incident, the robbery, the July  
10 2020 robbery. Were you surprised the Diaz family  
11 were robbed?

12 MR. MELCHER: Objection to form.

13 THE WITNESS: I don't recall that. Like I  
14 said, I don't have any reason to.

15 BY MR. BLOCK:

16 Q. I apologize for jumping around a little bit.  
17 When Mr. Holt came back to Seven Courts the second  
18 time I think you testified that you were not thrilled  
19 with that idea?

20 A. No. I said I did not approve that. I  
21 didn't say I wasn't thrilled. I was told he was  
22 coming back and I accepted the challenge.

23 Q. Fair enough. That is what you said you  
24 accepted the challenge.

25 Did there ever come a point in time where

1 you had instructions or Mr. Holt had instructions not  
2 to speak with tenants?

3 A. I don't understand your question. Can you  
4 repeat it again?

5 Q. Yes. Let me try this again. Do you recall  
6 if there was ever a time that someone instructed  
7 Mr. Holt not to speak with tenants?

8 A. No. I don't recall that at all.

9 Q. Were you ever under instructions not to  
10 speak with Mr. Holt?

11 MR. MELCHER: I believe that's the situation  
12 with me.

13 THE WITNESS: Okay. Yes.

14 BY MR. BLOCK:

15 Q. Let me ask it this way. I think I  
16 understand what happened there.

17 Talk to me about the CDC eviction  
18 moratorium. How did that affect Seven Courts?

19 A. Can you show me what the CDC moratorium said  
20 so that way I can know?

21 Q. Do you remember when the federal government  
22 said that you can't evict tenants for non-payment of  
23 rent because of COVID?

24 A. Well, that's why I'm asking. It was a lot.  
25 That is why I wanted to look at it and see what

1 you're saying. Yeah, it was like 38 or 40 pages of  
2 the moratorium. Sorry that's why I didn't want to  
3 answer it.

4 Q. I understand. You're aware for a period of  
5 time there was federal restrictions on removing  
6 tenants for non-payment of rent due to COVID?

7 A. That's correct.

8 Q. And obviously the Supreme Court said that  
9 was not constitutional and so you could evict tenants  
10 again.

11 How did that period or that moratorium  
12 affect you all at Seven Courts?

13 A. Well, the people got to stay there and  
14 eviction people didn't come, so they were just living  
15 there. It really didn't affect them. Everybody got  
16 affected because they were not paying rent. That's  
17 what I recall. I don't think nothing else. We have  
18 affordable housing and we help everybody pay their  
19 rent. So whoever want help, we help.

20 Q. What is a reverse write off?

21 A. A reverse write off could be a double  
22 charge. Okay. No reverse write off. That's when a  
23 person moves out and when they move out we do a  
24 deposit accounting and it curates charges and we  
25 write it off so we can close out the month.

1 Q. So if I show you -- I just want you to  
2 explain this to me. I will show you Exhibit 16?

3 A. Okay.

4 (Exhibit 16 was marked for identification.)

5 BY MR. BLOCK:

6 Q. Which is TPI 002513?

7 A. Can I ask you a question do you want me to  
8 still --

9 Q. You can move that. So TPI 2513 Exhibit 16.  
10 This is an e-mail thread between you and Eric Zamora  
11 and Mr. Harris about B-22 the first write-off which  
12 is from August 2021. Do you see that?

13 A. Yes.

14 Q. I have seen a few e-mails that refer to  
15 this. Actually if you flip to the next page you  
16 started this thread by saying: Hello, can you  
17 reverse the write off for rent? This was down before  
18 the deposit accounting in error?

19 What happened here?

20 A. I was teaching Maggie how do do write-offs  
21 and she missed a step. She did the write-off before  
22 she did the accounting. So it was looking like they  
23 still owed a balance. You're supposed to do it the  
24 other way around. You're supposed to do the deposit  
25 accounting first, and then do the write-off. So it



1 was looking like they owed money.

2 Q. And they didn't?

3 A. Well, we were -- I wouldn't even -- let me  
4 look and see. Yes. Okay. When she was writing them  
5 off instead of making it a positive, she gave them a  
6 credit. So it looked like amounts to be refunded was  
7 \$1,145.16 which actually it was not supposed to be a  
8 credit. It was supposed to be billed. That's what  
9 it was. They had damages charges. As you can see  
10 they did not remove their sofa and they did not pay  
11 their rent. So those days until we moved them out of  
12 the system they were charged for that.

13 Q. So that's why you said please don't cut  
14 check?

15 A. That's correct. And you can see it right  
16 here in parentheses where she gives the credit.

17 MR. BLOCK: Let's take a break here. I want  
18 to figure out the last few things I need to ask  
19 you. Let's go off the record.

20 (A short break was taken.)

21 MR. BLOCK: I don't have any further  
22 questions.

23 COURT REPORTER: Who was that speaking that  
24 said they wanted a copy of the transcript?

25 MR. BLOCK: Both attorneys want a copy.

Page 153

COURT REPORTER: Thank you. That's it.  
(Proceeding concluded at 2:21 p.m.)

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1 The following reporter and firm disclosures  
2 were presented by me at this proceeding for review by  
3 counsel:.

4 REPORTER DISCLOSURES

5 The following representations and disclosures are  
6 made in compliance with Georgia Law, more  
specifically:

7 Article 10 (B) of the Rules and Regulations of  
the Board Of Court Reporting (disclosure forms) OCGA  
8 Section 9-11-28 (c) (disqualification of reporter for  
financial interest) OCGA Sections 15-14-37 (a) and (b)  
9 (prohibitions against contracts except on a  
case-by-case basis).

- I am a certified reporter in the State of Georgia.

10 - I am an employee or independent contractor of  
Veritext Legal Solutions Reporting and Video  
11 ("Veritext Legal Solutions").

- I have been assigned to make a complete and  
12 accurate record of these proceedings.

- I have no relationship of interest in the matter on  
13 which I am about to report which would disqualify me  
from making a verbatim record or maintaining my  
14 obligation of impartiality in compliance with the  
Code of Professional Ethics.

15 - I have no direct contract with any party in this  
action, and my compensation is determined solely by  
16 the terms of my agreement with Veritext Legal  
Solutions.

17 VERITEXT LEGAL SOLUTIONS REPORTING & VIDEO  
18 FIRM DISCLOSURES

19 - Veritext Legal Solutions Reporting & Video was  
contacted to provide reporting services by the  
20 noticing or taking attorney in this matter.

- There is no agreement in place between Veritext  
21 Legal Solutions and any party or attorney in this  
litigation that is prohibited by OCGA 15-14-37 (a)  
22 and (b). Any case-specific discounts are  
automatically applied to all parties, at such time as  
23 any party receives a discount.

- Transcripts: The transcript of this proceeding as  
24 produced by Veritext Legal Solutions will be a true,  
correct, and complete record of the colloquies,  
25 questions, and answers as submitted by the certified  
court reporter.

1 - Exhibits: No changes will be made to the exhibits  
as submitted by the reporter, attorneys, or  
2 witnesses.

- Password-Protected Access: Transcripts and  
3 exhibits relating to this proceeding will be uploaded  
to a password-protected repository, to which all  
4 ordering parties will have access.

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## 1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

4 I hereby certify that the foregoing transcript  
5 was taken down, as stated in the caption, and the  
6 colloquies, questions and answers were reduced to  
7 typewriting under my direction; that the transcript  
8 is a true and correct record of the evidence given.

9 I further certify that I am not a relative or  
10 employee or attorney of any party, nor am I  
11 financially interested in the outcome of the action.

12 Disclosure pursuant to OCGA 15-14-37 (a)&(b):  
13 The party taking this deposition will receive the  
14 original and one copy based on our standard and  
15 customary per page charges. Copies to other parties  
16 will likewise be furnished at our standard and  
17 customary charges. A financial discount will not be  
18 given to any party to this litigation.

19 This the 17th day of June, 2021.

20  
21   
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23 \_\_\_\_\_  
24 DIONDRE C. THOMAS, RPR, CCR-B-2433  
25

<b>&amp;</b>	116:20 119:15	<b>19</b> 3:7 24:18 33:20	<b>2022</b> 1:15 21:6
<b>&amp;</b> 2:10 154:17,19	154:6	<b>1998</b> 10:23	26:4 112:4,23
156:12	<b>10/19/2021</b> 144:17	<b>1:21</b> 1:6	113:3
<b>0</b>	<b>100</b> 40:25	<b>2</b>	<b>20th</b> 120:11
<b>00003</b> 3:8 27:12	<b>105</b> 3:15	<b>2</b> 1:15 3:7 24:14	<b>21</b> 53:17
<b>00006</b> 29:1	<b>11</b> 3:16 116:9	24:17,25 33:20	<b>22</b> 3:6 53:15
<b>00009</b> 3:6 22:18	118:7,11 128:1,18	34:2,15,20 46:15	151:11
<b>00014</b> 3:7 24:18	128:24 129:11,12	116:10,11 117:3	<b>23</b> 101:15 109:16
<b>000460</b> 3:20	129:19	141:6	109:17 128:9
144:16	<b>11/1/2019</b> 143:14	<b>20</b> 29:3 32:22 46:6	141:4,7
<b>000474</b> 3:21	<b>1150</b> 144:22 147:2	79:13	<b>24</b> 3:7 76:6 117:7
147:15	<b>118</b> 3:16	<b>200</b> 142:10,12	117:17
<b>000492</b> 128:1	<b>11a</b> 127:22	<b>2014</b> 28:6	<b>2433</b> 1:21 156:24
<b>00056</b> 3:19 143:2	<b>12</b> 3:18 101:10	<b>2015</b> 24:2 28:3,15	<b>25</b> 34:1
<b>000575</b> 3:18 140:5	140:1,4,5	28:20	<b>2513</b> 151:9
<b>00060</b> 3:9 33:2	<b>12/2019</b> 25:12	<b>2017</b> 12:15,17,19	<b>2623</b> 101:13,16
<b>002513</b> 3:22 151:6	<b>12/22/2017</b> 34:19	29:3,7,12 34:21	102:6,10
<b>002615</b> 3:14 97:2	<b>1265</b> 141:18	35:1	<b>2626</b> 3:14 97:2
<b>003939</b> 3:10 46:13	<b>13</b> 3:19 142:23,25	<b>2018</b> 25:8	<b>27</b> 3:8 25:8
<b>004148</b> 3:11 49:15	145:12	<b>2019</b> 34:16 52:18	<b>2800</b> 2:10
<b>004172</b> 3:12 62:24	<b>13,000</b> 142:11	53:9,11,13,15 73:2	<b>29</b> 47:2 48:6,20,24
<b>004185</b> 3:13 82:2	<b>13631</b> 156:22	86:19,20 87:3,21	49:10
<b>03661</b> 1:6	<b>14</b> 3:20 97:6	143:4,9 144:10,21	<b>29th</b> 10:4
<b>1</b>	144:13,15,16	145:13	<b>2:00</b> 10:6
<b>1</b> 3:6 22:4,6,16,21	<b>140</b> 3:18	<b>2020</b> 34:1,3 36:20	<b>2:21</b> 153:2
24:11 106:20	<b>142</b> 3:19	46:15 49:18 52:16	<b>3</b>
118:21,22 143:4	<b>144</b> 3:20	55:11 63:3 83:6	<b>3</b> 3:8 27:6,9,14,20
144:21 145:13	<b>147</b> 3:21	111:17 128:9	28:2,15 83:25
147:20	<b>15</b> 3:21 113:10	146:6 147:20	117:3
<b>1,100</b> 143:11 144:7	117:9 128:9	148:10	<b>3,000</b> 134:4,14,19
145:1,15 146:21	147:12,15	<b>2021</b> 20:13,17	<b>3,400</b> 93:19
<b>1,145.16</b> 152:7	<b>15-14-37</b> 154:8,21	33:20 36:20,23	<b>30</b> 24:2 41:1 47:2
<b>1,150</b> 145:1,23	156:12	53:15 74:2 97:6	65:5 68:21 88:1
146:7	<b>151</b> 3:22	97:12,16,21,25	100:25 142:6,10
<b>1,200</b> 141:10,20,24	<b>1527</b> 16:20	103:6 104:10,15	<b>30,000</b> 142:14
146:7	<b>16</b> 3:22 151:2,4,9	114:7,20 117:9	<b>303</b> 2:10
<b>1,265</b> 141:16	<b>170</b> 40:25	118:21,22 119:3,6	<b>30308</b> 2:11
<b>10</b> 1:16 3:6,15	<b>17th</b> 156:19	119:8 132:12	<b>309</b> 2:6
22:19 63:2 105:12	<b>18</b> 50:3,4,5 51:8,10	141:10,24 143:7	<b>32</b> 3:9
105:14,18 116:20	51:19	146:6 151:12	<b>36</b> 28:6
		156:19	

## [37 - allegations]

Page 2

<b>37</b> 28:16	<b>63</b> 3:19 143:2	<b>accepted</b> 69:19	108:8 143:24
<b>38</b> 28:6,10,16,21	<b>7</b>	104:23 148:22,24	144:3
28:21 150:1	<b>7</b> 3:12 62:21,23	<b>access</b> 155:2,4	<b>advise</b> 124:18
<b>3rd</b> 28:20	119:17,20,22,24	<b>accident</b> 6:5	<b>affairs</b> 139:15,19
<b>4</b>	120:6 121:10	<b>account</b> 16:2 54:8	<b>affect</b> 149:18
<b>4</b> 3:2,9 32:24 33:2	<b>7/24/2020</b> 25:14	54:19 94:14,21	150:12,15
33:5 34:2 97:12	<b>700</b> 142:16	<b>accountant</b> 94:16	<b>affordable</b> 24:6
119:17,20,22,25	<b>739-8800</b> 2:11	<b>accountants</b> 94:15	150:18
120:6 121:11	<b>8</b>	<b>accounting</b> 62:14	<b>afraid</b> 63:12,18,21
<b>4/15/2021</b> 105:19	<b>8</b> 3:8,13 27:12	94:9 150:24	63:25
106:9	34:15 76:6 81:22	151:18,22,25	<b>african</b> 42:8,15
<b>40</b> 150:1	82:1,1,2 86:16	<b>accounts</b> 60:6,9	43:1 138:5
<b>40,000</b> 142:16	<b>80</b> 34:16	94:14	<b>afternoon</b> 10:6
<b>400</b> 2:6	<b>81</b> 3:13	<b>accrual</b> 123:1	<b>age</b> 30:3 50:6
<b>404</b> 2:6,11 53:2	<b>87</b> 33:21	<b>accurate</b> 154:12	<b>agency</b> 41:14
<b>4107</b> 16:21	<b>9</b>	<b>accurately</b> 103:4	139:17,17,20
<b>44</b> 143:24	<b>9</b> 3:14 96:24 97:1	<b>acknowledgment</b>	<b>agenda</b> 10:11
<b>46</b> 3:10	97:4 101:8,13	27:15,16,21 28:9	<b>agent</b> 129:8
<b>461</b> 3:20 144:16	104:18	29:2	<b>aggressive</b> 79:15
<b>48foe958</b> 107:21	<b>9-11-28</b> 154:7	<b>acquainted</b> 27:24	79:16
<b>49</b> 3:11	<b>911</b> 55:16 74:13	<b>act</b> 30:21,24 31:11	<b>aggressor</b> 44:23
<b>496</b> 128:1	<b>96</b> 3:14	31:19 32:2 35:9	<b>ago</b> 59:18 101:10
<b>5</b>	<b>997-8419</b> 2:6	35:16 37:2 39:4	<b>agree</b> 39:18 83:23
<b>5</b> 3:10 46:10,12,13	<b>9:00</b> 76:14 101:6	39:14 40:12 71:8	<b>agreement</b> 124:19
118:15	<b>9:30</b> 100:6	<b>action</b> 154:15	145:2,3 146:13
<b>5/17/21</b> 140:6	<b>a</b>	156:11	154:16,20
<b>50</b> 142:6,13	<b>a&amp;t</b> 56:13,17,18	<b>active</b> 61:12	<b>ah</b> 70:15,16
<b>50/50</b> 43:1	56:20,24	<b>actively</b> 16:1,3	<b>aha</b> 70:10,13,14
<b>500</b> 142:14	<b>a.m.</b> 1:16 119:17	87:17	70:17 95:15
<b>578</b> 141:5	119:20,20,22,25	<b>activity</b> 68:11	139:12
<b>581</b> 3:18 140:5	120:6 121:11	78:14	<b>ahead</b> 26:21 31:20
<b>599-8035</b> 53:2	<b>aaron</b> 2:3,7 4:7	<b>actual</b> 73:14 75:1	75:4 147:9
<b>5:00</b> 76:15	<b>aarp</b> 71:17,18	107:10 140:25	<b>air</b> 93:22
<b>6</b>	<b>able</b> 67:16 90:15	141:9,20	<b>aka</b> 71:2
<b>6</b> 3:11 49:11,14	95:8 101:7 115:17	<b>added</b> 104:4	<b>alert</b> 93:13
55:9 118:15	132:1 142:12	<b>addendum</b> 44:1	<b>allegation</b> 38:17
143:10	<b>abstain</b> 91:1	128:7	39:18 49:8 50:17
<b>60</b> 73:4 142:4,6,15	<b>ac</b> 93:14,16 122:6	<b>addition</b> 15:21	51:1,4,6 55:19
<b>62</b> 3:9,12 33:2		35:4	63:15
		<b>address</b> 82:6,17,20	<b>allegations</b> 38:18
		105:5 107:6,10,15	51:11,13,24 63:18

63:21 67:15 73:17 78:20 <b>alleged</b> 38:4,10 39:13 40:3 124:6 <b>allison</b> 2:4 <b>allow</b> 129:13 <b>allowed</b> 81:12 93:5 96:3,6 110:18 113:15 <b>allows</b> 54:22 <b>altercation</b> 44:15 <b>amended</b> 3:16 118:13,18 <b>amenities</b> 129:6 <b>american</b> 42:8,15 43:1 138:6 <b>americans</b> 138:1 <b>amounts</b> 152:6 <b>analysis</b> 101:16 102:7,10,16 <b>annual</b> 35:4 <b>annually</b> 32:8 <b>answer</b> 7:11 11:16 17:25 19:16,17,18 19:19,21,24 38:24 55:6 70:5 73:25 76:25 78:13,22 79:15 81:24 84:1 85:12 87:5 95:25 98:5 112:8 123:17 150:3 <b>answered</b> 84:19 96:3 <b>answering</b> 100:23 <b>answers</b> 3:16 4:22 118:5,13 154:25 156:6 <b>anthony</b> 56:15 <b>anti</b> 129:20 <b>anybody</b> 9:9 91:12 140:18 142:2	<b>anymore</b> 23:8,9 69:6 99:7 <b>apart</b> 51:4 <b>apartment</b> 5:11 43:23 56:24 81:2 96:19 128:9 129:16,21 132:25 143:3,25 145:19 <b>apartments</b> 11:21 11:22 107:1 128:3 147:25 <b>apologize</b> 8:12 70:17 148:16 <b>app</b> 16:25 57:21 <b>apparently</b> 83:7 <b>appearances</b> 2:1 <b>appearing</b> 5:3 <b>appears</b> 24:19 25:1 46:13 63:4 82:4,7 97:4 <b>apple</b> 16:25 17:3 17:22 18:12,13 54:5,16,20 <b>application</b> 22:23 22:25 23:9,15 24:1,4,8 42:3 <b>applied</b> 154:22 <b>appointments</b> 113:6,17,19 <b>appreciate</b> 20:5 21:19 81:24 <b>approached</b> 131:12 <b>appropriate</b> 44:12 89:13 90:18 <b>approval</b> 139:11 142:19 <b>approve</b> 139:12 148:20 <b>approved</b> 58:7 59:18,21 60:4	142:18 145:5,10 <b>approves</b> 139:13 <b>approximately</b> 117:3 <b>apps</b> 54:15 <b>april</b> 49:18 55:11 73:1 86:19 97:6 97:12,15,20,25 103:5 104:10,15 111:17 117:9 119:6 142:17 <b>area</b> 13:18,25 14:2 14:6,8 65:1 68:25 81:3 84:17 92:24 110:6 112:25,25 129:9 <b>areas</b> 102:20 129:4,12,15 <b>argumentative</b> 67:6 77:3 <b>armed</b> 73:7,9,12 73:15 74:4,5,11,14 83:24 85:1,5 88:24 89:1,10,12 89:18,19,20,21 90:2,6,13,17 91:21 132:12 <b>article</b> 154:6 <b>aside</b> 49:13 56:2 143:7 <b>asked</b> 18:19 51:18 52:20 55:24 60:13 64:10,16 65:5,21 68:16 88:1 96:16 125:10 129:2 <b>asking</b> 4:9 8:6,7 9:17 10:4 31:3 36:5,14 38:7 39:17 42:19 88:16 88:20 91:18 112:15 117:23	123:4,12,20 149:24 <b>assigned</b> 154:11 <b>assistance</b> 146:2 <b>assistant</b> 5:19 12:7 66:15 83:3 102:4 <b>associates</b> 61:9 <b>association</b> 96:19 145:19 <b>assume</b> 7:10 16:11 26:24 79:3 <b>assumed</b> 71:19 <b>assuming</b> 117:10 <b>assumption</b> 117:10 <b>atlanta</b> 1:2 2:11 14:9 41:2,11,14,19 41:23,25 59:12 66:17 70:13,18 95:16,18,20,20 113:7 <b>attached</b> 47:10 98:10,11 <b>attacked</b> 44:17 45:5,8 67:11 79:2 79:8,13 136:8 <b>attacking</b> 79:20 <b>attempt</b> 107:14 <b>attention</b> 50:8 132:15,20,23 <b>attorney</b> 6:21 154:20,21 156:10 <b>attorneys</b> 39:25 152:25 155:1 <b>august</b> 28:6 151:12 <b>authority</b> 41:2 66:17 70:13 <b>authorized</b> 129:8 143:25 144:4
---	--	---	--



<b>automatically</b> 154:22 <b>aware</b> 5:21 25:21 40:10 78:8 150:4	156:14 <b>basically</b> 103:11 120:2 122:10 127:19 140:15 <b>basis</b> 29:24 31:13 38:5 40:3 94:13 123:1 154:9 <b>basketball</b> 127:2 <b>bates</b> 22:7,8,9,18 24:18 27:12 <b>bedroom</b> 142:3,9 142:12 <b>beginning</b> 27:22 53:17 106:7 112:2 112:4,23 144:9,20 <b>begins</b> 117:4 <b>behalf</b> 1:4 2:2,8 <b>believe</b> 23:1 102:4 126:22 134:5,7 139:15 143:14 147:16 149:11 <b>beneath</b> 12:5 <b>best</b> 36:19 99:22 <b>better</b> 91:12 <b>beyond</b> 39:7 <b>bible</b> 126:6 127:20 132:21 135:5 136:23 137:3,14 137:15 <b>bid</b> 99:19,21 <b>bids</b> 84:16 99:4,17 <b>big</b> 79:1 <b>bilingual</b> 42:15,21 43:2 <b>bill</b> 53:14 93:12 <b>billed</b> 152:8 <b>biography</b> 10:17 <b>bit</b> 14:22 17:10 22:24 36:8,12 53:8 113:11 148:16	<b>bleed</b> 45:14 <b>blinds</b> 114:17 <b>block</b> 2:3,5 3:2 4:6 4:8 17:8,14,19 18:3,10 19:22 21:4 22:5 24:15 26:13,23 27:7 31:9,22 32:25 37:7,17 39:16 46:11 49:12 55:8 62:22 73:23 74:12 75:9,11 76:21 77:4,6,9,14,20,23 78:1 81:23 96:25 105:13 108:18,19 112:21 116:18 118:8 121:20,23 123:21,24 125:2,5 125:9 127:23 134:23 135:10 140:2 142:24 144:14 147:13 148:15 149:14 151:5 152:17,21 152:25 <b>blockfirmllc.com</b> 2:7 <b>blue</b> 145:18,18 <b>bmw</b> 72:9 <b>board</b> 154:7 <b>bobby</b> 97:7 <b>body</b> 87:12 <b>bonnie</b> 13:1,17,20 65:3,5 68:9,16,25 82:3 87:25 <b>book</b> 96:19,20 <b>bookkeeping</b> 62:14 <b>booklet</b> 96:17 <b>books</b> 61:20	<b>boss</b> 7:24 46:14 49:18 63:2,11 <b>bosses</b> 35:8 <b>bothering</b> 120:9 <b>bottom</b> 22:10 28:5 28:22 29:6 33:24 34:17,18 49:23 55:12 107:3 109:18,22 110:7 118:15 <b>box</b> 41:18 98:13 <b>boy</b> 122:21,22 <b>boyfriend</b> 66:23 71:20 <b>brand</b> 16:22 <b>bravo</b> 109:9 <b>break</b> 43:14 75:8 75:10 77:22,24,25 78:16,20 92:19 116:16 121:20,22 125:7 132:24 152:17,20 <b>breakdown</b> 42:11 <b>breaking</b> 43:13 116:15 <b>breezeways</b> 129:14 <b>bring</b> 21:24 47:11 69:15 81:7 130:5 <b>broke</b> 5:14 132:21 <b>broken</b> 5:12 <b>brought</b> 50:7 <b>brown</b> 70:7 71:2 <b>brownish</b> 110:12 <b>budget</b> 85:9 92:13 92:15,16 93:2,3,6 93:10,13,19 94:3,4 94:6,8,20,25 96:1 96:1,2,7 <b>budgeting</b> 85:24 92:18,23,24
---	--	---	---

[build - clean]

Page 5

<b>build</b> 55:12	<b>calls</b> 7:18	<b>cash</b> 57:21	140:25 141:9
<b>building</b> 71:14	<b>camera</b> 74:4 96:21	<b>catch</b> 5:4	147:7 150:22
98:9,11 109:9,19	100:10,11,12	<b>catching</b> 74:4	<b>charged</b> 140:19
109:25 110:2,3,3,4	118:20 133:12	<b>category</b> 92:20,21	142:1 152:12
110:4 120:4	135:5,7 137:9	92:23	<b>charges</b> 143:11
121:13,16,18	<b>cameras</b> 73:14,19	<b>cause</b> 47:3	144:20,24,25
131:2	73:20 74:1 96:11	<b>ccr</b> 1:21 156:24	150:24 152:9
<b>buildings</b> 109:24	96:16 97:17,20,25	<b>cdc</b> 149:17,19	156:15,17
<b>built</b> 62:9	98:3,14,18,23 99:1	<b>ceased</b> 58:18	<b>charging</b> 146:12
<b>bunch</b> 72:4 123:13	99:4,8,10 100:9,13	<b>cell</b> 14:25 15:3,4,4	<b>chart</b> 91:13
<b>burning</b> 55:15,22	100:18 101:2,5	15:12,17,25 16:6	<b>check</b> 57:21 59:25
<b>bus</b> 65:16	103:11,13 104:24	16:17 18:12,13,14	60:1 140:17
<b>business</b> 11:9	117:11,18,20	18:20,23,23 52:17	152:14
56:16 57:2 58:18	118:19,22,23	52:21 53:12,14,16	<b>checklist</b> 140:6,11
76:14 78:9 92:5	119:2,9,21 121:4	53:18,20 80:5	<b>children</b> 1:5
99:7	121:11	<b>center</b> 108:20	110:17 111:4
<b>businesses</b> 56:6	<b>canceled</b> 17:17	129:5	112:10,24 126:25
<b>bust</b> 75:21 86:25	<b>cancellation</b>	<b>certain</b> 93:6 121:6	127:4 130:10
<b>buy</b> 32:13	147:16	135:7	133:13 137:21,24
<b>buys</b> 32:7	<b>capital</b> 92:23	<b>certificate</b> 156:1	138:3
<b>c</b>	<b>caps</b> 63:6	<b>certified</b> 90:8	<b>choose</b> 119:24
<b>c</b> 4:1 50:3,4,5 51:8	<b>caption</b> 156:5	154:9,25	<b>chose</b> 139:5
51:10,19 110:3	<b>captures</b> 98:8	<b>certify</b> 156:4,9	<b>chronology</b> 86:18
154:7 156:24	<b>car</b> 74:21 75:4	<b>challenge</b> 69:19	<b>cindy</b> 12:11
<b>c&amp;k</b> 57:3	80:16,17 81:2,8	148:22,24	<b>circle</b> 109:5
<b>caceres</b> 1:4 125:23	126:24 127:3,4,9	<b>challenger</b> 136:8	<b>circumstances</b> 5:9
125:24 128:8	130:5 131:12	<b>challenges</b> 69:18	46:21 125:19
135:16 141:4,8,19	<b>caring</b> 135:3	<b>chance</b> 5:3	<b>cites</b> 106:21
<b>calendar</b> 21:5	<b>carolina</b> 14:10,10	<b>change</b> 21:3 23:20	<b>civil</b> 45:6,7
<b>call</b> 15:24 35:4	<b>carry</b> 80:5	53:18 80:24 81:6	<b>claim</b> 37:13,15
42:12 48:7 55:16	<b>cars</b> 72:12,13	81:9 94:1	<b>claimed</b> 72:9
61:21 74:13 84:15	129:21 130:2	<b>changed</b> 20:1,2,17	<b>claims</b> 39:1,11
95:4 98:13 113:20	138:10	20:21 21:1 52:22	<b>class</b> 32:8,10 33:19
114:13 116:3,8	<b>case</b> 4:9 6:17 8:19	53:16,21 61:1	33:25 34:1,25
117:18 125:22	9:8,14,24 10:16	80:23 81:1 135:18	<b>classes</b> 32:13
138:13 139:3	18:21 22:12 39:10	142:17	33:15 34:7 35:5
<b>called</b> 50:3 60:22	39:11,18 40:4,7	<b>changes</b> 155:1	<b>classification</b>
71:17 74:21 78:18	45:3,4,5,7,10	<b>characteristics</b>	29:25
145:17	47:25 60:3 125:19	31:13	<b>classmates</b> 61:14
<b>calling</b> 66:22	154:9,9,22	<b>charge</b> 45:12,12	<b>clean</b> 18:7 56:23
74:20 75:1		92:7 139:8,9	57:3 71:14

[cleaning - correct]

Page 6

<b>cleaning</b> 56:10,22 57:4 <b>clear</b> 15:11 118:11 <b>clearly</b> 64:6 87:20 139:4 <b>clerk</b> 6:11,15 <b>close</b> 150:25 <b>closed</b> 111:8,11,19 111:22 112:3,22 113:2,3,5 114:3,16 115:5 120:1 <b>closer</b> 80:4 <b>clubhouse</b> 129:5 <b>code</b> 120:13 154:14 <b>coi</b> 57:16 59:23 <b>collected</b> 92:10 <b>colloquies</b> 154:24 156:6 <b>color</b> 30:1 110:12 <b>column</b> 141:15 <b>come</b> 9:20 41:2 51:18 56:3 59:12 74:13 86:24 88:21 92:17 97:17,19 98:12 104:20 115:10,19 116:6,8 116:11 120:14,20 132:14,19,23 148:25 150:14 <b>comes</b> 125:14 133:9 <b>comfortable</b> 133:23 <b>coming</b> 8:20 47:10 69:15 110:1 148:22 <b>committed</b> 24:5 <b>common</b> 81:3 129:4,12,14	<b>communicate</b> 66:24 114:14 132:10 133:15 <b>communication</b> 66:23 <b>community</b> 43:21 61:12 112:11 128:4,19,21 129:7 139:15,18 143:25 <b>comp</b> 57:18 59:24 <b>compactor</b> 102:23 121:19 <b>companies</b> 11:1 32:20 56:21,22 62:8,15 69:13 122:1,3,12 <b>company</b> 5:14 10:25 15:4 19:6 26:15,25 27:2,5 31:18 32:7,9,18 43:16,19 57:4,23 61:4 62:6,7,7 71:17 74:24 75:1 78:8 84:18 86:1 90:20 91:17 99:6 99:8 106:10,11,23 112:17 118:5 122:20 138:18 143:24 144:4 146:12 <b>company's</b> 119:1 <b>compared</b> 117:21 <b>compensated</b> 62:17 <b>compensation</b> 154:15 <b>complained</b> 47:14 63:22 <b>complaining</b> 64:3 <b>complaint</b> 49:25	<b>complaints</b> 68:2 69:23 115:22 <b>complete</b> 154:11 154:24 <b>completion</b> 117:2 117:7 <b>compliance</b> 35:6 154:5,14 <b>complicated</b> 140:3 <b>complies</b> 31:18 108:12 109:8 <b>comply</b> 43:18 <b>complying</b> 35:9,16 39:4 <b>compound</b> 77:14 <b>compressor</b> 93:21 <b>computer</b> 129:5 137:5 <b>concerns</b> 115:22 116:13 <b>concluded</b> 153:2 <b>conduct</b> 45:15,16 <b>conference</b> 7:16 <b>confident</b> 38:14 <b>confidentiality</b> 124:19 <b>confirm</b> 73:12 <b>confirmed</b> 73:10 74:6 <b>conflict</b> 66:16,19 <b>confront</b> 34:11 <b>confrontational</b> 69:16 <b>confusing</b> 62:5,11 <b>confusion</b> 66:19 <b>congregate</b> 129:14 <b>congregating</b> 130:4,8 <b>connor</b> 59:5,8,10 81:20	<b>constitutional</b> 150:9 <b>contact</b> 107:4,13 113:22 114:22 115:1 <b>contacted</b> 102:5 154:19 <b>continued</b> 68:22 <b>contract</b> 58:2 106:15 116:23 143:3 154:15 <b>contractor</b> 154:10 <b>contractors</b> 56:12 56:13 57:7,11 58:1,4 59:18,21 60:3 120:20 <b>contracts</b> 154:8 <b>conversations</b> 6:20 <b>copies</b> 156:15 <b>copy</b> 27:13 43:25 44:4 47:11 48:3 108:4 118:16 128:2,2 143:1,3,18 147:3 152:24,25 156:14 <b>corner</b> 28:23 101:14 <b>corporate</b> 60:18 60:20 61:21,23 83:3 84:4 85:3,8 85:23,25 86:12 89:14 92:25 93:1 93:10 94:6,10 95:3 96:9 104:21 <b>correct</b> 10:5 14:4 15:16,18,20 16:4 17:1 19:12,12 20:3 23:10,17 24:3,7 25:2,3,6,9 26:8 27:1 28:6,16
---	--	---	--

[correct - day]

Page 7

28:22 29:7 31:15 32:19 33:6 34:11 35:3 37:25 38:3 41:13,16,22 42:22 42:25 43:3,9 44:2 44:3 47:21 49:1 51:9,20 54:21 60:10,21,23 61:1 62:16,20 63:8 64:18 66:2,8 68:24 70:9,14 73:6 74:2 76:16 78:21,22,23 81:5 86:6,9 87:4,18,22 88:6,17 89:11,17 89:23 90:9,11 91:8,10,14,16 93:4 94:18 95:17,19,22 96:10 97:14,18 98:15,21 100:14 101:9,11,22,25 103:3 104:24,25 105:25 106:17 107:2 109:14,20 110:16 111:1 113:8,17 115:25 117:1,5 119:10 128:5,15 139:23 140:13 141:2,11 141:12 142:8 143:22 144:5,6 145:7 146:23 147:2,23 148:2,4 150:7 152:15 154:24 156:8 <b>correctly</b> 13:9 41:9 98:6,17 <b>counsel</b> 2:1 128:2 154:3 <b>count</b> 106:18	<b>country</b> 36:25 <b>county</b> 156:3 <b>couple</b> 24:19 107:18 140:22 <b>course</b> 37:16 67:14 92:21 108:3 118:16 125:22 <b>court</b> 1:1 4:22 5:2 7:21 17:6,9,15,20 18:2,9 21:23 22:3 45:9 77:23 78:24 116:15 120:11 125:5 132:6 150:8 152:23 153:1 154:7,25 <b>courtroom</b> 5:25 6:12 <b>courts</b> 11:21,22,25 12:14,15,23 13:23 14:21 35:6,13,15 39:4 40:2,13,16,18 40:18,22,23,25 41:10 42:6 43:15 43:22 45:19,24 46:1,3 56:5,7 57:12 58:5 60:5 60:19 61:5,8,18 68:5 69:8 71:2,25 72:1,19 73:8 74:2 75:14,16,19,25 76:4,8 78:6,9,14 78:16,20 79:22,25 80:8 81:14 84:8 84:12 85:11,17,20 86:2,3 87:24 88:10,24 91:12,21 92:5,11 93:2 94:25 97:16,20,25 100:4,6 104:14 105:9 107:1,19 108:2 111:8	112:19 114:8 115:13 120:9,25 122:2,18 123:8,15 124:4,7 126:9 127:14 128:3 136:15 138:14,17 139:8 140:6,12 141:14 142:2 143:4 147:25 148:17 149:18 150:12 <b>courts's</b> 97:7 <b>courtyard</b> 131:8 <b>covid</b> 21:9,9,11 36:3,3,4,20,23 45:10 57:24 111:9 111:19 112:4,23 113:10,15 149:23 150:6 <b>coworkers</b> 16:7,12 17:2,21 18:15 <b>create</b> 95:13 <b>created</b> 15:23 <b>credit</b> 41:1 152:6,8 152:16 <b>crime</b> 72:2 75:13 75:16,19 76:8,11 76:13,17,22 78:8 90:13 <b>crimes</b> 72:1,6,18 75:25 132:17 <b>criminal</b> 45:4 <b>cross</b> 77:7 <b>curates</b> 150:24 <b>currently</b> 11:4 <b>custody</b> 125:16 <b>customary</b> 156:15 156:17 <b>customer</b> 105:23 106:10 119:16	<b>cut</b> 15:7 152:13 <b>cuts</b> 17:12 <b>cv</b> 1:6 <b>d</b> <b>d</b> 4:1 47:2,2 48:6 48:20,24 49:10 110:2 <b>daily</b> 68:11 119:18 119:20,22,25 <b>damage</b> 55:14 <b>damages</b> 152:9 <b>damaging</b> 55:21 <b>dangerous</b> 76:17 <b>dark</b> 36:12 76:18 80:3 <b>date</b> 9:18 20:2,4,4 54:4 75:20,23 88:2,12 97:11 111:13 116:22 117:3,7 144:19 <b>dated</b> 24:1 25:8 105:19 106:9 140:6 144:17 145:12 147:20 <b>dates</b> 9:19 <b>daughter</b> 49:25 50:4,17,24 51:2,4 51:5 52:5,8,9 123:15,21,23 125:8 133:15 <b>daughter's</b> 124:9 124:21 <b>day</b> 10:21 12:4,4 65:5 68:1,21 74:21 76:23 83:8 85:6 88:1 91:15 94:13,13 102:3 113:12 133:7 134:6 135:2 143:18 156:19
---	---	--	---

[days - doing]

Page 8

<b>days</b> 73:5 100:24 100:25 113:10 152:11 <b>dba</b> 106:11 <b>dca</b> 139:12,14 <b>dealer</b> 67:13 <b>debate</b> 136:5 <b>december</b> 20:16 28:2,15,20 29:3 <b>decide</b> 96:7 <b>decided</b> 53:23 71:12 112:6 137:15 <b>decides</b> 84:18,25 85:5,10,15 <b>decision</b> 69:12,15 85:20 86:4 99:1 119:21 <b>decisions</b> 84:6,11 89:15 110:24 <b>defeating</b> 34:8 <b>defendant</b> 1:10 2:8 <b>define</b> 32:14 <b>definitely</b> 36:13 <b>definition</b> 31:3 <b>definitions</b> 13:8 42:5 <b>degree</b> 11:11,14 <b>delivered</b> 111:13 111:16 131:18 <b>delivers</b> 130:20 <b>demographic</b> 42:6 42:8 <b>department</b> 12:8 94:9 139:15,18 <b>depending</b> 54:25 <b>depends</b> 36:24 <b>deposed</b> 5:9,10,22 37:21	<b>deposit</b> 116:23 150:24 151:18,24 <b>deposition</b> 1:13 4:18 5:20 6:19 7:1 8:5,7,20 9:8,14 37:22 156:13 <b>describe</b> 40:18 43:4 49:15,16 62:25 <b>described</b> 84:22 <b>describing</b> 47:13 124:6 <b>description</b> 3:3,5 24:19 25:2,11,17 25:22,23 40:24 <b>descriptions</b> 24:20 <b>desk</b> 133:9 <b>detail</b> 56:3 <b>detailed</b> 68:17 <b>details</b> 31:4 133:17 <b>detective</b> 74:10 76:25 <b>deter</b> 90:13 120:20 121:5 <b>determine</b> 40:11 <b>determined</b> 154:15 <b>determining</b> 139:9 <b>device</b> 15:19 <b>devices</b> 16:22 <b>diaz</b> 1:3 3:19 4:8 109:15 125:19,21 125:21 126:1,22 127:18,21 132:7,8 132:15,20,24 135:14 136:11 137:20,23 138:3 138:23 141:8,15 142:1 143:2,3 148:10	<b>difference</b> 14:6 <b>different</b> 11:1 12:21 15:19 32:3 32:5 42:4,7 57:2 58:2 65:17 68:23 71:9 92:18,18 104:6 112:15 141:13 143:8 <b>difficulty</b> 126:5 134:2 <b>dig</b> 41:18 <b>digits</b> 16:16 <b>diondre</b> 1:21 156:24 <b>direct</b> 88:12 154:15 <b>direction</b> 127:15 156:7 <b>director</b> 97:8 <b>dirt</b> 110:8 <b>disability</b> 30:1 41:7 70:12,12 <b>disabled</b> 38:20 <b>disagree</b> 118:25 <b>discipline</b> 59:12 <b>disciplined</b> 58:19 <b>disclosure</b> 154:7 156:12 <b>disclosures</b> 154:1 154:4,5,18 <b>discontinued</b> 94:1 <b>discount</b> 154:23 156:17 <b>discounts</b> 154:22 <b>discriminate</b> 31:12 <b>discriminated</b> 38:5,11 <b>discriminating</b> 40:2	<b>discrimination</b> 39:13 40:12 <b>discriminatory</b> 137:20 <b>discuss</b> 9:7,13 63:15,17,20 <b>discussed</b> 140:9 <b>discussion</b> 39:23 116:17 <b>discussions</b> 7:20 102:8,17 <b>disorderly</b> 45:15 45:16 <b>dispose</b> 120:22 <b>disposed</b> 120:23 <b>disqualification</b> 154:7 <b>disqualify</b> 154:13 <b>district</b> 1:1,1 <b>disturbance</b> 72:20 <b>division</b> 1:2 <b>docu</b> 106:1 <b>document</b> 18:21 21:13 22:7,11,17 24:18,23 27:11,23 28:13 29:9 30:14 33:8 36:15 105:15 105:25 106:8 117:21 118:4 128:3 140:9 143:1 144:16 <b>documentation</b> 36:6 144:11 <b>documents</b> 9:4 22:16 35:19 36:8 <b>dodge</b> 136:8 <b>doing</b> 4:15,21 19:4 36:22,23 41:25 43:11 67:4,24 68:4,6 79:13 89:25 111:7
--	--	---	---



[doing - exhibit]

Page 9

113:10 122:6,24 123:2 <b>dominique</b> 122:21 <b>door</b> 108:23 109:1 109:6 113:23 114:2,3,9,17,18,20 114:21 115:15,16 115:19 130:5 132:4,21 133:14 <b>doorway</b> 98:9 <b>double</b> 150:21 <b>douglas</b> 10:22 <b>downstairs</b> 47:23 <b>draw</b> 108:5,10 109:7 <b>dropped</b> 45:12 70:19 107:15 <b>drug</b> 67:13 75:16 75:19,21,25 86:25 <b>drugs</b> 67:10 <b>due</b> 150:6 <b>duly</b> 4:3 <b>dump</b> 120:17,21 <b>dumping</b> 120:3,8 120:24 <b>dumpster</b> 102:23 120:17 <b>dumpsters</b> 121:4 <b>duties</b> 11:24 14:21 <b>duty</b> 83:8	94:14 97:4,5,12 99:14 105:25 106:2 107:4,4,10 107:13,15 110:2 113:23 116:4,5 124:5 151:10,14 <b>e.m.f.</b> 1:5 <b>earlier</b> 81:15,19 112:12 121:25 128:23 129:1 <b>earth</b> 108:2 <b>easier</b> 16:19 <b>east</b> 2:6 <b>easy</b> 81:24 <b>economy</b> 11:13 <b>education</b> 10:20 <b>edwin</b> 1:4 128:8 141:4 <b>effect</b> 45:2 130:24 <b>effective</b> 89:10 <b>either</b> 20:6,24 59:2 133:3 <b>elaborate</b> 94:12 <b>elaborated</b> 47:18 <b>elevator</b> 102:24 103:21 104:5,7,8 120:4 121:15,15 <b>elevators</b> 103:18 <b>elr</b> 1:6 <b>elsa</b> 1:3 128:8 <b>email</b> 82:17 107:6 <b>emails</b> 20:7 59:8 <b>employee</b> 27:16,22 28:9,22 29:7,12,17 39:12 154:10 156:10 <b>employer</b> 19:24 20:21 21:1 32:7 33:10 <b>employment</b> 22:25	<b>enemy</b> 71:11 <b>enforce</b> 48:9 110:25 111:2 <b>enforced</b> 71:3 <b>enforcement</b> 120:13 <b>engaged</b> 39:13 <b>english</b> 42:24 135:22 <b>ensued</b> 116:17 <b>ensure</b> 35:9 39:2 <b>enter</b> 108:6 <b>entered</b> 67:15 146:19 <b>entertain</b> 112:13 129:15 <b>entitled</b> 22:17,18 28:13 33:20,25 34:2 128:3 140:23 144:17 <b>entrance</b> 108:5,7,9 108:11 110:1 <b>equipment</b> 106:21 <b>eric</b> 94:16,17 123:4 151:10 <b>error</b> 146:23 151:18 <b>especially</b> 5:2 <b>esq</b> 2:3,4,4,5,9 <b>estimate</b> 42:20,20 <b>estimated</b> 116:21 116:22 117:2,6 <b>etheridge</b> 5:11 <b>ethics</b> 154:14 <b>evening</b> 100:6 131:16 <b>everybody</b> 8:11 83:2,5 113:10 133:8 150:15,18 <b>evict</b> 149:22 150:9	<b>eviction</b> 149:17 150:14 <b>evidence</b> 156:8 <b>exact</b> 88:11 <b>exactly</b> 31:4 88:2 139:7 <b>examination</b> 4:5 77:7 <b>examinations</b> 3:1 <b>examined</b> 4:3 <b>example</b> 56:23 74:19 80:2 93:14 93:14 94:2 114:19 142:7,9 <b>excellence</b> 24:5 <b>excellent</b> 61:3 <b>exception</b> 79:1 <b>exclusive</b> 129:7 <b>excuse</b> 17:6,6 22:17 57:6 78:3 <b>executed</b> 128:8 <b>execution</b> 116:23 <b>exhibit</b> 3:5,6,7,8,9 3:10,11,12,13,14 3:15,16,18,19,20 3:21,22 22:4,6,16 22:21 24:11,14,17 24:25 27:6,9,14,20 32:24 33:2,5 46:10,12,13 49:11 49:14 55:9 62:21 62:23 81:22,25 82:1,1,2 96:15,24 97:1,4 101:13 105:12,14,18 108:4 116:20,20 118:7,11 119:15 127:22 128:1,18 140:1,4,5 142:23 142:25 144:13,15 144:16 145:12
<b>e</b>			
<b>e</b> 4:1,1 9:5,23,24 14:23 20:12,17 21:3,4,16 27:4 46:14 47:16,20 49:17 50:10 52:11 54:11,17,17 56:4 63:1 68:16 78:4 81:20 82:3,5,8,12 82:20,21,23,25 83:4,7,20 87:8			

[exhibit - forth]

Page 10

147:12,15 151:2,4 151:9 <b>exhibits</b> 3:3 21:21 21:24 22:1 155:1 155:1,3 <b>experienced</b> 31:5 <b>explain</b> 19:23 41:17 48:12 59:22 60:11 62:4 65:12 72:14 89:4 121:9 123:25 142:5 151:2 <b>explained</b> 74:23 <b>explaining</b> 145:14 <b>explains</b> 72:8 <b>explore</b> 124:13 <b>extra</b> 120:23 <b>eye</b> 3:15 96:13,14 96:22 97:7,9 98:4 99:19,21 101:20 102:1,7 103:5,17 104:23 105:1,15 105:18 106:11,16 114:22 115:1 117:12 118:23 119:2,8,16	37:2 39:4,14 40:12 88:20 103:16 104:9 117:8 148:23 <b>fairly</b> 14:12 31:7 <b>fall</b> 20:12,15 <b>false</b> 67:16 <b>falsified</b> 67:9 <b>falsify</b> 67:8 74:18 75:7 <b>falsifying</b> 67:4 <b>familiar</b> 50:12 133:21 140:11 <b>family</b> 4:8 15:14 45:18,23 46:15,18 61:7,14 67:14 109:16 125:19,21 125:22 126:2,23 127:18,21 132:7,8 132:15,20,24 135:14 136:11,18 138:23 139:3 141:9,15 142:1 143:4 148:10 <b>far</b> 25:21 37:24 55:2 <b>father</b> 137:2 141:8 <b>fear</b> 124:24 <b>february</b> 34:15 <b>federal</b> 31:11 149:21 150:5 <b>fedex</b> 5:12,14 <b>feel</b> 79:3,7,19 91:20 100:5 133:22 <b>fees</b> 140:19 <b>felt</b> 36:22 66:6 69:18 79:21 100:3 104:18 <b>female</b> 38:2	<b>ferry</b> 2:6 <b>fictitious</b> 78:20 <b>fight</b> 50:1,18 <b>figure</b> 99:9 136:20 152:18 <b>file</b> 26:7 116:14 138:9 <b>filed</b> 144:19 <b>fill</b> 24:8 119:11 <b>filled</b> 23:15 <b>fills</b> 83:2,4 <b>finance</b> 95:7 <b>finances</b> 91:25 95:19 <b>financial</b> 126:5 134:2 139:24 154:8 156:17 <b>financially</b> 156:11 <b>find</b> 38:24 57:24 77:1 133:16 141:18,23 <b>fine</b> 60:17 65:23 69:4 88:3 127:17 135:22 <b>firearm</b> 80:10,15 80:16 <b>fired</b> 59:2 76:4 <b>firm</b> 2:5 154:1,18 <b>first</b> 3:16,17 4:3 10:11,16 13:17 19:25 21:22 23:12 24:25 27:20 33:19 45:11,14 46:17 48:2 64:21 66:14 67:2 68:3 71:1 85:2 87:24 106:6 116:20,21,23 118:12,13 132:4 138:21 143:5,9,10 144:9,20,25 147:17 151:11,25	<b>fit</b> 77:13 93:8 <b>fitness</b> 129:5 <b>five</b> 11:1 56:12,24 57:6,7,11,25 58:3 58:4 59:18,21 60:3 61:12 <b>fixed</b> 146:20 <b>fliers</b> 111:13 <b>flip</b> 23:25 25:7 28:12 34:6 101:13 143:13 151:15 <b>floor</b> 102:24 <b>flores</b> 1:3 128:9 <b>florida</b> 14:10 59:10 60:20 86:10 86:13 <b>flyers</b> 111:16 <b>follow</b> 36:13 126:4 126:23 127:15 131:17 <b>following</b> 79:18 102:20 154:1,5 <b>follows</b> 4:4 <b>fontaine</b> 9:11,14 78:3,4 98:18,20 99:16 116:5 140:9 <b>fontaine's</b> 128:14 <b>forbids</b> 32:2 <b>force</b> 50:1,18 <b>foregoing</b> 156:4 <b>forever</b> 122:25 <b>forgot</b> 40:15 100:2 <b>form</b> 26:21 31:20 73:22 74:7 76:19 77:3,4,10,11,15 147:9 148:12 <b>formal</b> 99:21 <b>former</b> 87:9 <b>forms</b> 154:7 <b>forth</b> 17:23 106:12
<b>f</b>			
<b>face</b> 108:23 133:21 <b>facebook</b> 137:6,9 <b>facetime</b> 54:14 <b>facing</b> 98:7,7 109:2 <b>fact</b> 40:1 69:2 90:12 <b>facts</b> 91:23 133:5 <b>factual</b> 101:3 <b>fair</b> 10:7 11:14,14 30:20,24 31:11,19 32:2 33:20,25 34:2,15,20,20,25 35:2,4,5,9,10,16			

[forward - gotpi]

Page 11

<b>forward</b> 107:17	<b>g</b>	75:20,20,23 88:1	<b>goes</b> 72:13 83:2
<b>forwarding</b> 97:6	<b>g</b> 4:1 54:11,19	90:19 91:17 93:14	<b>going</b> 4:9,13 10:10
<b>foul</b> 83:9	81:18	104:1 114:19	10:11 11:15 15:24
<b>found</b> 51:13	<b>ga</b> 2:11 43:21	118:16 122:3	17:9,18,22 21:20
<b>foundation</b> 39:20	<b>gaa</b> 43:16 128:19	123:8 133:5	21:21,22 22:6,17
<b>four</b> 11:1 16:16	128:21	134:23 141:25	24:17 27:8,11
44:17 47:3 79:2,7	<b>gainesville</b> 126:16	142:7	28:25 29:15 33:1
83:10 84:15 98:2	<b>gang</b> 78:14	<b>given</b> 29:16 30:12	34:13 36:19 40:13
98:3 99:5,7	<b>gap</b> 119:12	55:20 76:10 93:10	40:16 44:6 45:13
100:11,13 103:13	<b>gate</b> 120:14 121:1	143:1 147:3 156:8	45:17 46:20 49:19
104:6 106:19	<b>gateway</b> 41:4	156:18	59:22 60:18 61:11
116:22 117:16	<b>gathering</b> 55:5	<b>gives</b> 118:5 152:16	62:4,11 65:17,17
142:3,9,12	<b>gayner</b> 13:1,2,17	<b>giving</b> 42:17 88:12	75:12 77:9,18
<b>frame</b> 112:20	14:11 65:3,7 68:9	91:22 101:4	78:25 80:4 85:1
<b>frederick</b> 10:22	68:25 82:3,8	104:16 142:8	85:10,21 86:3
<b>free</b> 62:19	83:11 87:25	<b>glass</b> 114:17 115:8	89:9 91:11,23,24
<b>freon</b> 93:25	<b>general</b> 4:20 8:8	115:9,10,13	92:19 96:4,11,13
<b>fresh</b> 70:1	27:15,21 29:1	<b>gmail.com.</b> 54:12	100:5 102:4
<b>friday</b> 8:3 76:15	41:23 57:17 59:24	<b>go</b> 4:13 10:15 11:3	103:11 109:3,10
<b>friend</b> 62:1,2	92:19 126:2	11:4,6,7 17:10	115:11 116:8
122:8,17	<b>generally</b> 88:23	23:2,4 24:16	117:19 120:4
<b>friends</b> 15:14	<b>generate</b> 61:17	25:10,13 26:21	121:16 125:6
48:11 61:9,10,15	130:19	31:20 32:13 33:18	127:25 131:12
61:16,24 122:1	<b>geography</b> 86:14	33:24 37:24 38:23	133:5,22 137:8
138:19	<b>georgia</b> 1:1 14:9,9	52:25 62:1 64:21	139:10,24,25
<b>friendship</b> 122:14	80:6 126:15,18	71:25 74:24 75:4	140:22 141:23
<b>front</b> 29:21 35:19	139:17,18 154:5,9	75:12 81:2 82:2	142:7 144:7,24
102:14 108:5,7,8,9	156:2	84:3,18 90:1	147:14 148:9
108:10,22,23	<b>gesture</b> 115:4	96:18 99:3 100:2	<b>good</b> 4:7,25 5:8
109:1,6 118:12	<b>getting</b> 7:3 68:17	101:1 107:17	6:9,16 7:15 9:7
129:9 131:9	71:20 96:16	111:4,6 113:24	11:15 16:5,5 18:7
<b>full</b> 13:6 126:9	140:15	115:13,16 116:19	18:18 31:8 33:11
<b>fulton</b> 156:3	<b>girl</b> 50:1,18	119:9,15 121:25	42:4 53:23 68:4,6
<b>funny</b> 19:5 73:19	<b>gist</b> 37:8 63:3	124:14 125:2,6	70:20 113:13
<b>furious</b> 51:23	<b>give</b> 4:22 5:3 10:10	128:23 129:21	<b>goods</b> 56:7 92:8
<b>furnished</b> 156:16	16:16,18 19:1	130:18,22,24	<b>google</b> 15:22 108:2
<b>furniture</b> 120:18	20:1,4 27:12 31:5	131:9 132:7 133:5	<b>gotcha</b> 146:5
<b>further</b> 124:14	33:2 36:5 40:23	133:11 136:10,19	<b>gotip.org</b> 82:6,17
152:21 156:9	42:5 46:23 49:16	136:21 137:15	82:22 83:1
	50:20 52:23,24	138:4 146:18	<b>gotpi</b> 116:4,4
	61:10 65:5 71:13	147:9,18 152:19	



<b>gotpi.org</b> 107:4 <b>gotpi.org.</b> 107:11 <b>government</b> 41:14 139:20 149:21 <b>grace</b> 32:3,5,6,9 32:13,14,23 33:9 33:15 34:25 35:7 39:5,7 <b>graduated</b> 10:23 <b>great</b> 11:10 <b>greater</b> 56:3 <b>greenish</b> 110:11 <b>greenville</b> 126:17 <b>griffin</b> 126:14,15 <b>groceries</b> 130:6 <b>gross</b> 140:23 <b>ground</b> 4:13 91:9 <b>grounds</b> 12:9 131:23 <b>guard</b> 87:9,14,20 88:5,10,24 90:7 <b>guards</b> 86:17,18 89:1 <b>guess</b> 7:8 9:10 48:14 51:19 64:9 64:15 88:14 90:12 97:8 106:18 <b>guesswork</b> 46:25 <b>guests</b> 112:13 129:15 <b>gun</b> 135:16,23,24 135:25 137:10 <b>gunpoint</b> 134:21 <b>guns</b> 76:3,4 <b>guy</b> 55:13 <b>guys</b> 17:7 50:2,19 81:10	<b>habies</b> 70:7 <b>hair</b> 120:16 <b>half</b> 42:14,14 50:5 <b>hallway</b> 121:13 <b>hand</b> 6:10 21:25 36:15 128:2 <b>handbook</b> 27:15 27:16,21,22 28:9 28:22 29:1,7,12,17 <b>handle</b> 20:23 <b>handler</b> 93:22 <b>happen</b> 49:4 69:22 90:15 131:16 <b>happened</b> 5:19 51:21,22 58:17 68:20 87:11 101:7 104:20 117:24 133:6 149:16 151:19 <b>happening</b> 78:8 86:7 <b>happens</b> 76:17,22 121:2,17 <b>harassing</b> 52:6 64:18,25 65:8,10 <b>harassment</b> 28:13 28:19 29:10,11,20 29:23 30:7,10 34:8 65:10,12 <b>harbison</b> 2:10 <b>hard</b> 57:23 115:9 <b>harris</b> 7:25 8:16 8:22 12:11,25 46:15 47:1 49:7 49:18,24 55:11,24 63:2,14,17,20 65:3 82:3,7 83:12,16,23 94:11 97:5 119:24 151:11 <b>harris's</b> 13:12	<b>hear</b> 17:7 47:5 66:10,11 78:25 94:25 125:13 133:6 <b>heard</b> 21:16 42:4 120:7 133:2 138:22 <b>hearing</b> 138:21 <b>held</b> 5:15 66:18 <b>hello</b> 151:16 <b>help</b> 27:23 38:8 57:22 61:19 67:5 84:6,10 90:13 108:1 115:6 122:23 127:19 134:2,12 145:24 146:1 150:18,19 150:19 <b>helped</b> 56:12,15 <b>helpful</b> 135:4 <b>helping</b> 41:15 126:8,10 <b>helps</b> 132:1 <b>hey</b> 74:22 90:2 93:13 116:1,9 132:3 133:24 <b>hickey</b> 69:13 88:8 88:9,15 124:5 133:18 <b>high</b> 10:19,22 61:10 102:24 103:18,20 104:8 109:21,25 110:4,9 110:11 <b>hill</b> 32:3,5,6,9,13 32:14,23 33:9,15 34:25 35:7 39:5,7 <b>hip</b> 81:4 <b>hire</b> 12:2 <b>hired</b> 87:8	<b>hispanic</b> 42:9,21 43:2 138:4 <b>hispanics</b> 137:25 <b>historically</b> 16:6 <b>history</b> 10:20 <b>hold</b> 121:14,15 <b>holds</b> 123:2 <b>holt</b> 46:14,25 47:13 48:4,5 49:2 49:17,24 50:14,16 52:8 53:10 55:10 55:19 56:3,4 58:13 63:1,11 64:5,7,25 65:8,22 67:2 68:3,20,22 69:3,8 82:5 83:6 83:24 86:19 87:21 87:23 111:12,15 111:15,16 124:5 126:11 131:1 132:3 139:2,4 147:17,18 148:17 149:1,7,10 <b>holt's</b> 82:8 <b>hom</b> 128:9 <b>home</b> 112:13 129:16 139:11 142:19 <b>homes</b> 93:17 <b>hooked</b> 121:17 <b>hope</b> 84:19 111:14 125:13 <b>horace</b> 46:14 82:5 111:15 <b>hostage</b> 5:15 <b>hotel</b> 120:15 <b>hour</b> 76:14 102:22 <b>hours</b> 76:6,6,9 78:9 83:10,13,25 85:6 101:10 117:7 117:17 119:17
<b>h</b>			
<b>h</b> 81:18 <b>h.m.f.</b> 1:6			

<b>household</b> 142:11 142:13 <b>housing</b> 24:6 30:21,24 31:11,19 32:2 33:20,25 34:2,15,20,20,25 35:5,6,9,10,16 37:2 39:4,14 40:12 41:2,8,11,12 41:14,20,24,25 66:17 70:13,18 71:6 95:16,18,20 95:21 134:1 150:18 <b>hud</b> 139:22,25 <b>huh</b> 13:10,24 15:13 16:9 17:16 36:21 56:19 83:15 92:6 137:16 141:22 147:21 <b>human</b> 59:1 94:7 113:14 <b>humans</b> 146:17 <b>hundred</b> 34:19 <b>hypothesis</b> 136:17 137:13	<b>illegal</b> 31:11 120:24 <b>image</b> 107:19 <b>images</b> 108:2 <b>imessage</b> 17:4 <b>immigration</b> 138:13,16 139:3 <b>impartiality</b> 154:14 <b>important</b> 4:25 5:1 27:23 89:2 <b>incident</b> 49:20 50:12 55:25 68:14 72:8 75:21 123:14 124:2,3 148:9 <b>incidents</b> 124:2 133:3 <b>include</b> 107:14 <b>including</b> 29:25 83:9 <b>income</b> 41:5,8 95:14 <b>incorrect</b> 20:1,4 86:21 <b>incorrectly</b> 87:5 <b>independent</b> 154:10 <b>index</b> 3:1 <b>indian</b> 42:10 <b>individual</b> 29:24 <b>individuals</b> 75:3 <b>industry</b> 31:24,25 <b>infield</b> 110:12 <b>influence</b> 93:5 <b>information</b> 52:23 61:11 119:17 145:20,21 <b>infraction</b> 51:16 51:17 52:4 67:15 111:3 129:25 130:1,3,4,18	131:18 <b>infractions</b> 127:6 138:8,9 <b>initialed</b> 140:10 <b>injured</b> 76:3 <b>ins</b> 78:16,20 <b>inside</b> 6:12 93:21 93:22 112:13 129:15 130:24 131:4 135:7 138:4 <b>inspections</b> 12:2 <b>install</b> 97:17,20 104:24 <b>installation</b> 106:21 116:22 117:2,4,7 117:16,17 <b>installed</b> 99:6 <b>instance</b> 9:22 53:19 <b>instances</b> 44:24 <b>instructed</b> 78:7 87:25 149:6 <b>instructions</b> 149:1 149:1,9 <b>insurance</b> 57:16 <b>intend</b> 136:3 <b>intended</b> 27:23 127:24 <b>intentional</b> 29:23 <b>interact</b> 126:7 <b>intercourse</b> 52:5 <b>interest</b> 154:8,12 <b>interested</b> 156:11 <b>interpret</b> 129:19 <b>interrogatories</b> 3:17 118:14 119:1 <b>interrogatory</b> 118:3,19 <b>interrupting</b> 17:17 <b>intruder</b> 102:21 102:22,23,24	105:2,6,8 <b>intruders</b> 103:19 103:20,22,25 104:11,15 <b>intruding</b> 102:25 <b>investigate</b> 40:1 <b>investigated</b> 40:11 49:7 51:13 <b>investigation</b> 35:14 37:2,9 38:25 39:1 40:7,8 51:15 <b>investigations</b> 35:18 70:2 <b>invoice</b> 93:12 122:22,24 123:4,5 <b>invoices</b> 60:8 122:25 <b>involved</b> 48:15 87:10,17 123:14 124:10 <b>involving</b> 40:8 <b>iphone</b> 16:24 52:15 54:15 <b>iq</b> 102:16 <b>irrelevant</b> 65:25 <b>ish</b> 76:15 112:23 <b>issue</b> 69:20 87:19 95:9 114:4 116:12 <b>issues</b> 34:10 51:8 51:10 94:7 <b>it'll</b> 38:8 93:13 <b>item</b> 94:25 <b>items</b> 92:24 93:6 96:7 140:10
<b>i</b>			<b>j</b>
<b>i9</b> 57:15,15 <b>icloud</b> 54:5,8,17 55:2 <b>idea</b> 99:10,12 148:19 <b>identification</b> 22:4 24:14 27:6 32:24 46:10 49:11 62:21 81:22 96:24 105:12 118:7 127:22 140:1 142:23 144:13 147:12 151:4			<b>jacob</b> 12:11 <b>jacobs</b> 26:16,19 <b>jail</b> 50:4 <b>jamaile</b> 94:15

<b>janitorial</b> 56:10,21	135:22 137:23	76:20,22,25 79:19	<b>laurie's</b> 59:4
<b>january</b> 33:20	138:6	80:2,6 81:9 83:19	<b>law</b> 2:5 31:12 80:6
34:21 120:11	<b>kind</b> 10:17 12:3	85:12 87:6,10,12	90:14 154:5
<b>jeff</b> 36:13 77:7	15:5 16:22 17:16	88:1,11 91:11	<b>lawsuit</b> 37:19,22
<b>jeffrey</b> 2:9	17:17,23,24 35:5	92:2,3 94:4,5 95:6	38:2,25 39:1 40:8
<b>jmelcher</b> 2:12	49:19 62:11 65:14	111:12 116:5,7	<b>lawsuits</b> 144:5
<b>job</b> 10:12 11:22,24	66:15,20 69:4	122:15 123:14,17	<b>lawyerly</b> 31:3
12:16,19 14:20	72:6,18 76:13	124:2,13 125:12	<b>lawyers</b> 8:8 18:19
15:24 23:15 24:1	84:11 92:12 98:7	125:20,24 126:19	19:2 105:18
24:8,19,20 25:1,2	101:23 120:18	127:3,10 132:5,11	<b>lay</b> 39:20
25:11,17,18,21,22	124:4 126:20	132:11 133:4,10	<b>learn</b> 58:9,12
25:22 43:8,11,11	127:10 139:20	133:19,25 134:10	71:10
46:8 48:10 65:14	<b>kinds</b> 71:25 72:18	135:6,8,8,12,25	<b>learned</b> 20:25
68:5,6 69:21 76:7	<b>king</b> 120:14	136:20,23 137:7	50:25 53:23
76:11 77:1 99:17	<b>kiya</b> 125:8	139:24 149:20	136:23
123:2	<b>knew</b> 33:12 58:6,7	<b>knowing</b> 75:3	<b>learning</b> 71:6
<b>john</b> 12:11 70:7	87:19 125:20	76:13 124:8,9	<b>lease</b> 44:1 104:1
71:2	133:17,20 134:1	<b>knowledge</b> 19:14	116:24 123:23
<b>judge</b> 77:17	136:20 146:11,14	26:16 57:19	125:23 128:8
<b>july</b> 46:15 132:12	<b>knock</b> 114:3,9	<b>known</b> 75:7	143:3 145:22,23
148:9	<b>knocking</b> 114:21	<b>knows</b> 11:16 95:4	146:4,7,10,13,24
<b>jump</b> 18:4	<b>knocks</b> 114:1,20	<b>I</b>	146:25 147:6,7
<b>jumping</b> 148:16	<b>know</b> 6:8 7:18	<b>I</b> 81:18	<b>leases</b> 43:17
<b>june</b> 1:15 25:8	9:15,18,22,24	<b>lab</b> 129:6	145:19
156:19	10:17 14:5,16,18	<b>label</b> 22:7,8,9	<b>leasing</b> 103:1,10
<b>k</b>	15:24 16:1,14	24:18 27:12	<b>leave</b> 13:7 47:5
<b>keep</b> 28:25 34:13	17:16 19:20,23	<b>lady</b> 45:5,7 49:9	49:3 87:23 113:22
36:10 41:24 53:8	20:3 21:21 22:8	67:13,22	138:5 148:8
53:9 75:13 77:2	22:14 23:23 26:12	<b>lane</b> 10:25	<b>leaving</b> 69:14
80:7 115:22	26:14,15 27:2	<b>languages</b> 42:23	124:20
134:10 136:1	29:16 30:9,20	<b>large</b> 124:1	<b>ledger</b> 144:17
140:22	31:1,16 35:13	<b>late</b> 132:5 140:19	<b>lee</b> 70:7
<b>keeping</b> 71:13	36:7,16,24 37:10	144:10 146:6	<b>left</b> 14:14,18
<b>keith</b> 97:7,8,11	37:14 39:2,25	<b>latoya</b> 1:14 4:2	120:16
105:3	40:15,17,20 42:10	23:2,16 147:24	<b>legal</b> 118:4 154:10
<b>kept</b> 69:3	47:24 49:20,25	<b>latoyawynn22</b>	154:11,16,17,19
<b>key</b> 98:13	52:7 54:12 58:3	54:12	154:21,24
<b>kick</b> 62:10	60:7 61:23 62:8	<b>laundry</b> 102:25	<b>letter</b> 113:4
<b>kids</b> 54:12 112:19	65:11 68:14,22	103:10 104:7	<b>letterhead</b> 147:22
127:10 129:8	70:6,6 71:16,19	<b>laurie</b> 58:25 59:1,5	148:6
131:7 135:11,12	73:9 74:8 76:1,8	59:7,10 81:15,16	

[letting - making]

Page 15

<b>letting</b> 138:5	<b>lives</b> 47:25 49:10	144:12,19,24	<b>maggie</b> 9:10 48:7
<b>level</b> 43:17 66:18	<b>living</b> 46:6 150:14	145:12 149:25	64:19,25 66:20,21
79:3 85:4 86:8	<b>llc</b> 2:5 19:7,8,10,11	152:4	96:16 102:4 116:5
92:25 95:3	19:13,15 20:3,18	<b>looked</b> 96:20	126:6 131:12
<b>liability</b> 57:17	20:22 21:2 24:9	152:6	133:7,22,23
<b>licensed</b> 90:10	25:19 26:10,18,20	<b>looking</b> 27:14,19	151:20
<b>light</b> 81:18	29:17 30:10 31:17	33:12 34:9 36:13	<b>mail</b> 14:23 20:12
<b>lighting</b> 68:10	61:2 80:21 106:10	38:9 66:5 78:3	20:17 21:4,16
69:25	148:3,6	84:14 97:16,19	27:4 46:14 47:16
<b>likelihood</b> 28:8	<b>local</b> 139:17	109:13,23 110:17	47:20 49:17 50:10
<b>likes</b> 64:10,12,13	<b>located</b> 96:21 98:6	117:21 151:22	52:11 54:11,11,17
<b>likewise</b> 156:16	100:2	152:1	54:17,19 63:1
<b>liking</b> 71:12	<b>location</b> 98:24	<b>looks</b> 11:13 24:1	68:16 78:4 81:20
<b>limited</b> 29:25	100:11 103:14	25:4,7,13 28:2,25	82:3,5,12,20,21,23
129:9	107:1 121:7	29:2 33:18 34:14	82:25 83:4,7,20
<b>limits</b> 41:8	<b>lock</b> 21:10,10	34:15,24,25 83:10	97:4,5,12 99:14
<b>line</b> 63:3,7 82:6	<b>locked</b> 98:19	104:6 105:22	106:2 107:4,4,10
92:13,15,17 96:2	<b>log</b> 54:3,16,18,19	107:12 108:20	107:13,15 113:23
144:25	<b>logo</b> 43:23	110:7,14 117:15	116:4,5 151:10
<b>list</b> 41:3 122:3,4	<b>loitering</b> 72:20	128:10 144:18	<b>mailbox</b> 98:7
147:24	120:3 121:13	<b>lost</b> 146:9	130:20
<b>listed</b> 144:21	126:24 129:11,12	<b>lot</b> 34:6 50:6,13	<b>mailboxes</b> 100:5,8
<b>lists</b> 106:20 140:24	129:20 130:7,17	57:18 74:19 76:17	109:2,4,7
<b>literally</b> 138:11	130:23 131:14	79:16 90:15	<b>mailed</b> 21:3 87:8
<b>litigation</b> 147:4	<b>long</b> 31:25 53:22	102:21 103:17	<b>mailing</b> 9:24 82:8
154:21 156:18	71:1 88:9 100:24	109:2,15 110:15	<b>mails</b> 9:5,23 56:4
<b>little</b> 8:14 14:22	101:1 111:21	114:25 120:19	94:14 124:5
17:10 22:24 24:12	115:16 126:7	121:16 126:13,25	151:14
36:12 53:8 57:14	<b>longer</b> 56:17	127:10 142:21	<b>main</b> 49:22
71:13 73:10 93:16	<b>longest</b> 73:20	149:24	<b>maintaining</b>
110:15 112:19	<b>look</b> 16:15 18:19	<b>loud</b> 44:9 47:14	154:13
113:11 130:9	22:21 24:22 29:2	<b>love</b> 35:21 48:11	<b>maintenance</b> 12:6
135:11,12,22	30:25 33:3 38:23	48:13,16,25 69:17	12:8,8 81:10
148:8,16	52:10 53:13 54:1	<b>luther</b> 120:14	92:21,22 121:17
<b>live</b> 40:20 46:1,3	66:6,12 71:8 72:2	<b>lying</b> 104:3 134:13	131:22
47:2,2 55:13	83:6 88:14 96:17	134:16,18 135:11	<b>major</b> 120:24
117:19 118:20,22	97:11 100:1 102:6	<b>m</b>	<b>making</b> 35:10
119:2,9 123:15	105:22 106:5,18	<b>m</b> 109:7	49:25 50:17 59:23
<b>lived</b> 45:19,24	110:10 128:6,16	<b>madam</b> 21:23	71:11 99:1 152:5
46:6 47:13,23	128:23 141:9,19	<b>madame</b> 77:23	154:13
51:19 123:8	141:23 143:10,23	125:5	

[man - monthly]

Page 16

<b>man</b> 48:14,15 122:16,17,20 132:21 <b>manage</b> 143:25 <b>management</b> 10:24 11:9 19:10 19:13,15 20:3,17 20:21 21:1 24:9 25:18 26:2,4,10,18 26:20 29:17 30:9 31:17,25 32:20,21 32:22 34:8,11 61:2 67:5 72:16 79:11 80:21 86:1 102:17 112:11 128:11 129:13 148:3,6 <b>manager</b> 5:19 11:23,25 12:7,18 13:9,13,18,21,23 13:25 14:2,3,6,7 14:21 25:2,12,18 31:6 43:6 65:1 68:25 76:7 78:6 84:18 85:15,20 89:16 91:7 93:9 94:21 95:23 96:6 102:8 105:24 115:21 143:16 147:25 <b>managers</b> 15:6 <b>manages</b> 86:1,3 <b>map</b> 107:18,19 109:17,24 110:10 110:17 <b>march</b> 34:1,2 63:2 83:6 111:17 <b>marital</b> 30:2 <b>mark</b> 22:6 24:17 27:8 33:1 46:12 49:14 108:16	109:22 118:9,10 128:1 <b>marked</b> 22:4 24:14 27:6 32:24 46:10 49:11 62:21 81:22 96:24 105:12 118:7 127:22 140:1 142:23 144:13 147:12 151:4 <b>market</b> 97:24 140:24 141:14,16 141:17 <b>marking</b> 62:23 <b>marks</b> 2:4 <b>martin</b> 120:13 <b>mathematical</b> 42:20 <b>matter</b> 154:12,20 <b>max</b> 2:4 <b>maximum</b> 142:15 <b>mclester</b> 23:5,14 <b>mean</b> 6:9 9:15 31:25 42:16,21 43:20 44:13 52:2 57:15 58:6 61:9 61:13 64:9,12 65:18 66:12 67:19 72:15 73:13 75:17 85:25 86:1 89:4 108:2 135:12 136:5 142:5 <b>means</b> 22:11 51:1 102:18 130:18 <b>measures</b> 84:7,12 119:13 <b>media</b> 34:1 <b>medications</b> 79:18 <b>medrano</b> 1:4 125:22,23 128:8 141:4	<b>meet</b> 7:20 9:7 35:8 <b>meeting</b> 7:16 102:1 <b>meetings</b> 6:23,25 39:23 <b>melcher</b> 2:9 6:21 6:25 7:17 8:25 19:18 26:12,21 31:8,20 37:3,10 39:15,24 55:6 73:22 74:7 75:8 76:19 77:3,5,8,12 77:17,22 108:16 112:20 123:19 124:17,23 125:1 134:22 147:9 148:12 149:11 <b>member</b> 45:19 46:16,18 <b>members</b> 45:23 61:7,15 <b>memory</b> 72:6 82:14 <b>mental</b> 41:6 70:11 70:12 <b>mentioned</b> 68:1 81:16 103:15 105:10 136:25 137:3 147:14 <b>message</b> 16:25 113:22 <b>messages</b> 17:3 18:20 19:1 50:21 55:1 <b>met</b> 40:21 95:25 101:19 103:5 <b>mf</b> 128:16 <b>mid</b> 140:6,11 <b>middle</b> 114:7 116:21 119:16,18 140:16,20	<b>middleman</b> 92:12 <b>mind</b> 74:6 <b>mindful</b> 137:7 <b>mine</b> 17:5 107:7 <b>minor</b> 1:5 <b>minute</b> 33:3 49:16 141:25 <b>minutes</b> 61:12 <b>misconduct</b> 124:6 124:7,10 127:14 <b>mispronounce</b> 23:12 <b>missed</b> 151:21 <b>mistaken</b> 78:19 <b>misunderstood</b> 89:8 <b>mixture</b> 42:10 <b>mlk</b> 108:6,8 <b>mold</b> 34:8 <b>monday</b> 76:15 <b>money</b> 42:3 85:10 85:16,21 86:4 92:7,8 94:22,22 123:3,6 134:11 152:1 <b>monitor</b> 98:14,18 121:8 <b>monitored</b> 119:17 119:22 <b>monitoring</b> 105:19 106:10,11 117:6 120:2 121:10 <b>monster</b> 34:9 <b>month</b> 95:7 116:23 119:12 140:6,11,16,16,21 141:11,16,18,20 141:24 143:11 144:8 150:25 <b>monthly</b> 42:2 95:6 95:12
---	---	---	---

[months - oh]

Page 17

<b>months</b> 50:5 72:10 117:12 <b>moon</b> 145:18,18 <b>moratorium</b> 149:18,19 150:2 150:11 <b>morning</b> 4:7 101:6 <b>motivate</b> 12:1 <b>motivation</b> 80:14 <b>motive</b> 65:11 <b>move</b> 11:2 125:17 136:12 140:17 143:19 150:23 151:9 <b>moved</b> 37:12 40:9 45:15 63:5 137:11 143:9 152:11 <b>moves</b> 150:23 <b>movie</b> 47:11 <b>moving</b> 63:4 130:6 140:18 <b>multiple</b> 22:15 65:9 <b>murder</b> 72:22 73:1,4 86:20 87:2 87:10 <b>murders</b> 72:23 <b>music</b> 47:6,10,10 47:14	<b>names</b> 65:2 122:5 123:9,13 141:3 <b>national</b> 30:1 31:13 38:12 40:3 106:10 145:19 <b>nature</b> 66:1,3,5 <b>near</b> 98:8 126:19 <b>necessarily</b> 88:20 <b>necessary</b> 89:3 <b>need</b> 5:3 17:10 18:5 22:24 24:21 42:3 57:22 59:25 70:4 83:12 86:14 89:6,10 101:23 104:1 109:22 124:25 125:2 136:5 152:18 <b>needed</b> 56:23 83:24 88:24 94:3 134:12 140:19 <b>needs</b> 41:6,12 84:4 101:16 102:7,10 102:16 <b>networking</b> 61:13 <b>never</b> 30:12 46:8 47:16,20 49:5 57:1 105:1,5,10 111:6 135:1,2 137:10,11 138:22 145:1 146:21 <b>new</b> 25:25 26:2,3 60:7 98:1,1 99:8,8 99:10 112:17 145:22 <b>newer</b> 93:17 <b>newnan</b> 126:19 <b>night</b> 47:3 76:18 76:23 83:13,25 101:8 135:14 <b>nine</b> 100:7 117:18	<b>non</b> 28:19 29:11 29:20 30:7,10 68:17 149:22 150:6 <b>normal</b> 71:8 <b>normally</b> 11:1 95:8 131:15 <b>north</b> 14:10 <b>northern</b> 1:1 <b>noted</b> 77:5 <b>notice</b> 65:5 68:21 88:1,3 112:5 130:18 132:3,6 144:4 147:17 <b>notices</b> 131:18 <b>noticing</b> 154:20 <b>notify</b> 111:24 <b>november</b> 20:16 24:2 118:22 119:3 119:8 143:4 144:21 145:5,13 <b>number</b> 15:22,25 16:1,17,21,21 21:25 52:24,25 53:2,6,6,16,18,20 55:19 86:15 124:2 128:23,24 129:19 <b>numbers</b> 16:15 22:9,10,14 42:17 52:16,17,21 53:10 53:12 101:13 <b>numerous</b> 93:11	<b>objection</b> 39:15 73:22 74:7 76:19 77:3,15,21 112:20 147:9 148:12 <b>objections</b> 77:10 77:12,19 <b>obligation</b> 154:14 <b>observations</b> 103:9 <b>observed</b> 83:8 <b>obstruct</b> 77:16 <b>obviously</b> 9:15 14:23 40:17 87:15 92:5 132:11 147:6 150:8 <b>occasions</b> 72:12 <b>occur</b> 68:13 72:1 94:4 <b>ocga</b> 154:7,8,21 156:12 <b>october</b> 20:16 118:21 119:2,8 128:9 142:18 145:11,16 147:20 <b>office</b> 47:5 49:3,5 51:18,22 55:15 60:19,20 80:18 81:3 84:15 89:15 92:20,22 98:6,10 98:15,19 100:9 103:1,10 104:21 108:15,18,23 109:1 110:3 112:1 113:2,2,4,7,14,16 114:2,24 120:1 130:19 <b>officer</b> 85:7 <b>offs</b> 151:20 <b>oh</b> 5:16 8:6,25 11:10 15:8 22:25 28:24 34:17 40:22
<b>n</b>	<b>n</b>	<b>o</b>	
<b>n</b> 4:1 107:15 125:8 <b>name</b> 4:7 20:2 23:12,20 25:4 56:11,14,16 59:4 81:18 94:7 107:1 122:20 123:16,19 123:22 124:9,14 124:21 125:8 143:24 144:3 <b>named</b> 70:6 106:24		<b>o</b> 4:1 108:18 <b>o'clock</b> 100:7 104:18 116:9,10 116:11 <b>oath</b> 118:5 <b>object</b> 26:21 31:20 84:4	



[oh - parties]

Page 18

52:20 58:2 60:17 82:23 86:16 95:5 95:18 100:22 113:13 121:8 129:12 <b>okay</b> 4:10,11,16 4:20 5:6,7,22 6:2 6:6,15 7:3,9,13 8:4,7,10,15,22 9:2 9:21 10:13,18 11:19,24 12:6 13:14,16,19,22 14:5,11,20 15:8 16:3,14 17:19 18:1 19:14,20 20:14,19 21:12,15 21:17,20 22:13 23:14,18,22,24 24:13,24 25:10 27:10 30:17,19 31:16 34:17 36:17 38:1,1,22,24 39:19 46:22 47:16 48:5 48:23 52:20 55:18 59:9 60:12,17 61:22 62:4,5 65:13 70:25 71:3 71:18 72:5 75:15 77:8,22 81:6 84:9 84:18,21 87:7,20 88:4 89:8 90:5,16 92:1,3 93:23 95:6 96:12 97:3 98:25 100:22 102:6,12 102:19 104:5,22 105:16 106:3,22 107:12,16,24 110:10,14 111:16 111:16 112:9 116:10 118:6,24 119:20 124:22	125:1,1,16 126:1 127:8 128:16,25 129:4,8,12,23 133:5 140:3 141:7 143:8 149:13 150:22 151:3 152:4 <b>old</b> 67:13 100:13 100:13 101:2,5 145:21 <b>older</b> 38:20 93:16 <b>once</b> 13:20 20:23 35:1 52:4 67:23 85:8,23 108:7 112:1 116:23 117:3,15 133:7 <b>ones</b> 43:13 98:1,2 127:15 <b>online</b> 32:12 137:15 <b>onsite</b> 102:17 <b>open</b> 45:3,6,10 111:25 116:7 <b>opened</b> 112:1 133:7 <b>operations</b> 12:4 <b>opinion</b> 42:17 90:19 91:19,22 104:17 134:22,24 <b>order</b> 113:25 115:14,18 116:12 <b>ordering</b> 155:4 <b>org</b> 91:12 <b>orient</b> 108:1 <b>orientation</b> 30:3 <b>oriented</b> 109:23 <b>origin</b> 30:1 31:13 38:12 40:3 <b>original</b> 156:14 <b>outcome</b> 156:11	<b>outline</b> 10:10 <b>outside</b> 76:18 78:9 80:3 93:21 111:5 115:6 121:18 122:14,17 126:25 129:22,23 130:2,3 130:5,10,17,25 131:3,6,13 <b>outsource</b> 74:23 <b>overall</b> 43:6 103:10 <b>overhead</b> 108:1 <b>overlooked</b> 146:18 <b>oversee</b> 12:1 <b>overseeing</b> 13:18 <b>overseer</b> 12:3 92:12 <b>overtalk</b> 7:7 17:4 <b>overview</b> 140:20 <b>owed</b> 151:23 152:1 <b>owens</b> 56:13,15 <b>owned</b> 56:6 58:3 <b>owner</b> 58:8,10 <b>owners</b> 57:9 <b>owns</b> 57:7	106:7,19 108:13 116:20,21 118:15 128:6 141:6,16 143:10,13 151:15 156:15 <b>pages</b> 28:10 96:18 106:19 107:18 140:22 150:1 <b>paid</b> 50:5 71:21 117:11 144:9 146:21,22 <b>paint</b> 56:10 57:3 <b>painting</b> 56:22 57:4 61:8 <b>pandemic</b> 126:9 <b>paper</b> 117:13 130:19 148:4 <b>paperwork</b> 74:24 105:11 122:24 138:12 <b>paragraph</b> 143:10 143:23 <b>parent</b> 51:18 52:3 106:23 <b>parentheses</b> 152:16 <b>parents</b> 51:19,21 <b>park</b> 80:3 <b>parking</b> 55:13,20 62:6 102:21 103:17 109:2 110:15 126:25 127:10 <b>part</b> 8:25 28:9 37:21 85:24 92:14 98:19 128:7 139:23 <b>partial</b> 118:20 <b>particular</b> 57:16 <b>parties</b> 154:22 155:4 156:15
		<b>p</b>	
		<b>p</b> 4:1 <b>p.m.</b> 100:6 101:8 119:17,22,24 120:6 121:10 153:2 <b>paces</b> 2:6 <b>package</b> 95:12 <b>page</b> 3:5 4:15 23:25 24:25 25:7 25:10,13 27:20 28:12,16,18,21 29:1,9,11,21 33:19 34:6,9,13,20 101:13,13 102:6 102:13 105:22	

[partnership - pool]

Page 19

<b>partnership</b> 1:9 3:16 20:9 24:5 25:1,11 27:17,24 28:6,22 29:7,12 106:9,16,24 118:12 144:1,5 147:25 <b>party</b> 32:17 40:21 47:4 143:24 144:4 154:15,21,23 156:10,13,18 <b>pass</b> 55:13,20 <b>password</b> 155:2,3 <b>pause</b> 17:24 50:9 <b>pay</b> 57:20,21 113:24 115:14,17 116:10 117:15 120:22 121:3 134:3 139:10 146:22 150:18 152:10 <b>payable</b> 60:6,9 94:14,14 <b>paying</b> 141:20,24 142:20,22 146:10 146:14,21 150:16 <b>payment</b> 42:2 116:24 117:19 149:22 150:6 <b>payments</b> 132:5 <b>payroll</b> 92:22,22 94:21 <b>peachtree</b> 2:10 <b>peeing</b> 103:21 <b>people</b> 39:3 40:2 40:20 41:11 43:10 48:17 50:6,18 57:14,23 61:19 62:8 67:9,18 71:11 73:15,15 74:20 78:17 79:14	86:12 96:21 98:12 105:4 116:6 120:3 120:7 123:14 124:8,12,24 126:5 136:21 138:20 140:19 142:21 146:16 147:7 150:13,14 <b>percent</b> 33:21 34:16,19 41:1 142:4,6,6,7,10,13 142:15 <b>perform</b> 57:25 61:17 62:14 <b>performed</b> 122:2 <b>performing</b> 58:4 60:4 <b>perimeter</b> 131:4,4 <b>period</b> 114:2 119:12 150:4,11 <b>permission</b> 50:21 <b>person</b> 7:2 13:11 13:25 29:24 38:20 38:21 55:4 69:16 91:9 104:3 105:4 115:1 121:8 131:23 133:20,24 142:10,11,13 143:16 150:23 <b>personal</b> 15:4,12 16:6,8,17,21 18:12 53:19,20 54:17 84:3 134:22,23 135:25 136:4,10 <b>personnel</b> 26:7 <b>pete</b> 122:7,8,15 <b>phone</b> 5:3 7:2 14:25 15:3,4,4,6 15:12,17,25 16:6 16:17 18:12,13,20 18:23 47:19 52:17	52:21 53:12,14,16 53:18,20,22,24 54:1,2,6,23 59:16 77:18 80:5 113:20 <b>phones</b> 18:14,23 53:25 <b>phonetic</b> 5:12 26:17 59:5 69:14 70:7,8 94:15,17 <b>phonetics</b> 12:12 <b>photographs</b> 54:23 <b>physical</b> 41:7 44:15 70:11 <b>physically</b> 93:8 111:4 <b>pic</b> 55:16 <b>pick</b> 75:5 120:6 <b>picking</b> 67:17 <b>picture</b> 47:9,18,19 48:3 132:4 <b>piece</b> 130:19 <b>pile</b> 24:12 <b>pine</b> 126:12,13 <b>pinpoint</b> 132:1 <b>place</b> 41:11,15 84:7,12 85:2 118:21 130:13 154:20 <b>places</b> 103:17 104:6,10,14 <b>plaintiff</b> 2:2 3:4,17 118:13 <b>plaintiffs</b> 1:7 4:9 <b>plan</b> 11:10,11 <b>play</b> 100:19,23 110:18 111:6 112:10,19,24 113:1 129:9 137:24	<b>playground</b> 110:5 110:6,13,19,20 111:5,19,25 112:10,18,22 127:1 129:9 130:10,11 137:24 137:25 138:5,6 <b>playgrounds</b> 111:8,21 112:3 <b>playing</b> 60:16 111:5 126:25 127:1,11 130:10 138:10 <b>please</b> 18:4 84:9 108:11 129:15 134:24 152:13 <b>plenty</b> 124:4 <b>plumber</b> 122:7,8 122:15 <b>plumbing</b> 62:6 122:7 <b>point</b> 20:15 37:1 48:21 53:15 58:9 60:24 99:16 111:9 115:12,20 116:16 135:13 148:25 <b>pointing</b> 119:19 <b>police</b> 44:19 45:1,9 70:3 73:13 74:10 74:13,21 76:24 <b>policy</b> 28:14,19 29:10,11,20,22 30:7,10 31:18 78:12 80:19,20,22 80:23,24,25 81:6 81:13 104:19 112:16 129:20 <b>pool</b> 98:7 102:22 103:18 108:21,22 108:24 122:15,16 122:17,20 129:6
--	---	--	---



[porch - ran]

Page 20

<b>porch</b> 131:5	143:17 145:4,5,20	78:5 79:11,12	146:15,16,17
<b>portal</b> 95:15,16	146:8,9,17,19,19	81:11,11 85:15,19	<b>putting</b> 59:6
<b>porter</b> 12:11	<b>problem</b> 10:8 37:6	89:16 91:7 93:9	<b>pyramid</b> 13:22
<b>position</b> 12:9	43:14 57:14 69:21	93:16 95:9,21,23	<b>q</b>
<b>positive</b> 152:5	77:4,11 114:7,21	96:6 99:25 101:16	<b>quality</b> 68:17
<b>possible</b> 92:14	115:7 120:25	102:7,10,16	<b>question</b> 7:4,5,11
<b>possums</b> 83:9	130:9,12	105:23 115:21	8:12 17:24 19:5
<b>post</b> 55:16	<b>problems</b> 67:1,3	120:21 131:1	19:16 21:18 27:18
<b>potential</b> 132:16	<b>proceeding</b> 125:20	147:24	27:19 63:14 77:11
132:17 140:23,25	153:2 154:2,23	<b>property's</b> 82:23	80:1,13 83:22
<b>practice</b> 98:22	155:3	82:25	84:1,9,19 87:5
<b>precautions</b> 79:24	<b>proceedings</b>	<b>proposal</b> 97:7,12	91:5 94:11 97:22
135:6	154:12	104:23	97:23 100:23
<b>preceding</b> 101:8	<b>process</b> 59:23	<b>protected</b> 29:25	104:13,22 112:15
<b>precise</b> 42:20	84:13 99:21	155:2,3	124:17 126:21
<b>premises</b> 81:7	<b>processing</b> 85:9	<b>protest</b> 65:17	127:16 148:7
<b>prepare</b> 6:18 7:1	<b>produce</b> 22:15	<b>prove</b> 67:16	149:3 151:7
8:4	<b>produced</b> 22:11	<b>proven</b> 78:18	<b>questions</b> 4:10,12
<b>prepared</b> 140:15	143:1 154:24	<b>provide</b> 57:11	4:21 11:15 18:3,6
<b>prescribed</b> 79:18	<b>professional</b> 90:7	61:24 154:19	29:15 39:21 44:5
79:18	154:14	<b>provided</b> 61:4	49:19 55:7 70:4
<b>present</b> 10:21	<b>program</b> 54:1	105:17	88:20 91:24 95:25
<b>presented</b> 154:2	<b>prohibit</b> 29:23	<b>provides</b> 56:7	118:4 123:12
<b>presumably</b> 42:23	<b>prohibited</b> 154:21	<b>providing</b> 68:5	152:22 154:25
<b>pretty</b> 38:14	<b>prohibitions</b> 154:8	<b>pull</b> 71:12 101:7	156:6
145:24	<b>project</b> 101:21	<b>pulled</b> 114:17	<b>quickly</b> 17:23
<b>previous</b> 103:11	<b>proof</b> 132:5	144:18	<b>quote</b> 42:16
126:21 134:1	<b>proper</b> 77:21	<b>purchase</b> 53:24	139:16
<b>price</b> 146:19	<b>properly</b> 12:4	93:18 133:12	<b>quoting</b> 29:22
<b>prices</b> 142:8,8	<b>properties</b> 42:1	<b>purchased</b> 98:4	<b>r</b>
146:18	79:14 88:25	<b>pursuant</b> 156:12	<b>r</b> 4:1
<b>printed</b> 145:6,20	122:10 126:8,10	<b>pushed</b> 66:15,20	<b>race</b> 30:1 31:13
<b>prior</b> 72:11 99:2	126:11,14	<b>pushing</b> 45:11	38:11 40:3
132:14	<b>property</b> 10:24	<b>put</b> 22:14 49:13	<b>racist</b> 137:20
<b>priscila</b> 2:5	11:23,25 12:18	51:12 56:2 65:19	138:24
<b>probably</b> 4:25	13:9,23 14:21	93:12 105:4 109:5	<b>rainbow</b> 71:15
8:10 16:2 20:15	25:2,12,18 31:6,25	109:10 115:14	134:1
21:21 24:12 26:6	32:22 34:11 44:18	116:13 118:21	<b>raise</b> 6:9 44:7
42:14 44:6 45:13	55:14,14,21 67:25	121:4 130:13	<b>ran</b> 125:11,15
88:13 95:4 103:15	68:23 69:6 70:25	131:5 132:2,3	
111:17 142:3,20	72:16 76:6,7 77:2	138:8 145:20	

[random - report]

Page 21

<b>random</b> 137:18	99:11,13,13,14	<b>recount</b> 44:22	<b>remained</b> 136:15
<b>rank</b> 127:9,13	102:3 104:12	<b>rectangle</b> 110:11	<b>remaining</b> 118:21
<b>rats</b> 83:9	111:7,12,13,20,23	<b>redacted</b> 123:13	<b>remember</b> 6:5
<b>reach</b> 47:1	118:2 119:6,14	124:8 141:3	32:1 35:23,25
<b>read</b> 7:11 24:20,21	120:5 133:1 134:6	<b>reduced</b> 156:6	36:1 37:3,5,8,13
46:20,24 49:16,21	148:13 149:5,8	<b>refer</b> 68:13 151:14	37:15 47:12,15
<b>reading</b> 29:20	150:17	<b>reference</b> 118:23	50:16 51:1,6
<b>reads</b> 27:22 46:25	<b>receipt</b> 28:13,18	<b>referred</b> 66:17	55:19 76:5 82:12
49:23	29:10,11	128:22 133:25	88:16,18,21
<b>ready</b> 57:2 63:5	<b>receive</b> 25:17	<b>referring</b> 128:18	111:21 122:5,13
<b>really</b> 5:21 6:7	144:4 156:13	129:17	126:20 127:17,20
11:2 13:4 54:13	<b>received</b> 82:13	<b>reflect</b> 103:4	132:8,9 149:21
60:25 67:24 71:20	105:15 116:24	<b>refunded</b> 152:6	<b>remove</b> 152:10
102:3 104:12,20	<b>receives</b> 154:23	<b>refused</b> 66:25	<b>removed</b> 64:10,16
107:25 118:14	<b>receiving</b> 82:12,14	69:24,24	<b>removing</b> 150:5
121:1 125:13	<b>recognize</b> 22:22	<b>regional</b> 13:13,21	<b>rent</b> 50:5 57:2
126:3,6,8 131:10	24:23 27:15,20	14:2,6,9 65:1 69:1	92:7 113:25
131:16 132:9	31:24 128:12	83:3 84:17	115:15,18 116:10
133:14 150:15	141:13	<b>regions</b> 14:10	127:19 133:13
<b>realtime</b> 98:23	<b>recollection</b> 36:19	<b>regular</b> 76:14	134:3,12 137:19
<b>reason</b> 36:14	87:23 101:1	<b>regularity</b> 76:4	139:10,11 140:23
67:11 79:17	<b>recommendation</b>	<b>regulation</b> 127:25	140:24,25,25
103:14 118:25	89:18	<b>regulations</b> 43:18	141:9,10,15,16,17
123:12 125:11	<b>record</b> 7:10 11:18	43:22,23 110:21	141:20 142:14,16
142:20 148:14	15:11 24:17 32:14	112:12 128:4,17	142:19 143:10,11
<b>reasons</b> 135:25	40:19 46:24 49:14	128:20,21 154:6	144:7,8,9,21 145:5
136:4,10	49:15,23 52:25	<b>relate</b> 18:20	145:10,16,24
<b>recall</b> 6:7 7:23	59:6 62:1,3,11,25	<b>related</b> 65:14	149:23 150:6,16
9:18 13:4 14:14	65:19 72:10 75:9	<b>relating</b> 155:3	150:19 151:17
18:18 20:24 21:7	75:12 78:2 82:1	<b>relationship</b> 26:10	152:11
25:20,24 26:1,5	100:15,19 104:17	41:11 43:4 67:20	<b>rental</b> 31:12 145:1
29:18 30:11,13,15	105:18 109:18	70:21,24 122:11	145:3 146:1,1
31:21 35:12,24	116:17,19 118:10	154:12	<b>rents</b> 142:17
36:5,6 38:4,6,8,10	121:24 125:3,6	<b>relationships</b> 62:9	<b>rep</b> 96:22
38:22 40:5 47:24	140:5 143:23	67:18,19,21	<b>repeat</b> 27:18 97:23
50:20,22,23 52:11	147:16 152:19	<b>relative</b> 123:11	149:4
53:13 54:3,4	154:12,13,24	156:9	<b>repo</b> 74:24 75:1,2
55:23,24 56:1	156:8	<b>relatives</b> 61:3	<b>repoed</b> 72:12
74:3 76:1,5,24	<b>recording</b> 100:17	123:7 124:10	74:22
78:15 79:23 81:9	<b>records</b> 88:15	<b>religion</b> 30:2	<b>report</b> 47:4 55:12
81:14,20,21 82:15			55:17 63:3,11

[report - sale]

Page 22

67:12 68:10,11,14 72:2 76:10,11,11 82:7,9 83:7 95:7,7 95:10,13,24 132:2 132:16 154:13 <b>reported</b> 49:3,6 55:10 66:21 124:3 132:20,24 <b>reporter</b> 4:22 5:2 17:6,9,15,20 18:2 18:9 21:23 22:3 77:23 78:25 116:15 125:5 152:23 153:1 154:1,4,7,9,25 155:1 <b>reporting</b> 154:7 154:10,17,19,19 <b>reports</b> 41:19,21 44:20 45:1 68:17 69:24,25 74:14 123:13 124:2,3 <b>repository</b> 155:3 <b>represent</b> 4:8 <b>representations</b> 154:5 <b>representative</b> 101:20 102:2 <b>request</b> 42:2 <b>requests</b> 18:21 <b>require</b> 42:1 57:17 <b>required</b> 68:10 69:25 <b>requirement</b> 41:7 <b>requires</b> 35:11 <b>research</b> 64:9 <b>reset</b> 54:1 <b>resident</b> 37:11 47:1,24,25 48:6,19 48:24 55:21 63:4 72:11 144:17	<b>residents</b> 15:24 63:12,24 71:7,15 71:18,23,24 74:18 75:6 79:16 103:23 111:24 113:15 121:12 126:3 129:7,13 130:16 136:24 <b>resolution</b> 133:10 <b>resource</b> 59:1 <b>responded</b> 83:19 <b>responses</b> 118:3 118:19 <b>responsible</b> 93:2 143:16 <b>rest</b> 144:25 <b>restrictions</b> 150:5 <b>retaliate</b> 63:22 <b>retaliated</b> 63:13 64:2 <b>revenue</b> 61:17,24 62:2,2 <b>reverse</b> 150:20,21 150:22 151:17 <b>review</b> 9:4 21:13 30:14 154:2 <b>reviewed</b> 106:3 <b>revised</b> 25:12 <b>ride</b> 75:4 <b>ridiculous</b> 135:19 <b>right</b> 5:13 6:10 7:4 9:4 10:9 11:14 12:21 14:11,20 15:21 21:17 24:6 25:22 28:5,23 29:19 31:4 40:15 43:25 45:3,6,10 48:17,17,23 55:9 59:17 64:24 68:23 69:9 70:3 72:23 73:8,19,21,24	74:22,25 76:18 86:16 87:15 91:11 91:13 92:4,8 93:14 94:24 97:13 97:15 100:1,8,23 101:12,14 104:1 104:23 106:5,13 106:16 107:4 108:8 109:3,5,10 109:13,18 110:2 110:15 111:19 117:4,8,11,20 119:18 120:17 121:4 122:13 125:17 126:20 128:4 130:20 136:1 138:19 144:1 147:18,22 148:1,3 152:15 <b>ring</b> 133:12 135:5 135:20 <b>rise</b> 102:24 103:18 103:20 104:8 109:21,25 110:4,9 110:11 <b>road</b> 2:6 <b>rob</b> 137:15 <b>robbed</b> 73:14,15 134:3,14,17,18,21 135:1,9,15 136:9 136:17 137:17,18 139:1 148:11 <b>robberies</b> 73:7,7,9 <b>robbery</b> 73:12,17 74:5,5,11,14 132:12 148:9,10 <b>robert</b> 82:3 <b>rode</b> 71:7 <b>rodrick</b> 12:11 13:6 46:14 49:6 58:24 65:3 84:17 94:11	95:3,4,5 96:22 106:2 119:23 126:8 <b>roger</b> 68:1 <b>role</b> 13:6 92:10,14 93:8 94:20 <b>romantic</b> 64:14 70:20,24 <b>roofing</b> 62:7 <b>room</b> 102:25 103:10 104:7 124:20 <b>rough</b> 42:19 101:4 <b>roughly</b> 14:14 35:1 36:1 43:1 75:22 88:13 111:11 <b>rpr</b> 1:21 156:24 <b>rubber</b> 55:15,22 <b>rule</b> 110:25 111:2 <b>rules</b> 4:13 43:13 43:14,15,18,19,21 43:23 48:9 71:3 110:21 112:12 114:12,12 126:4 126:22 127:24 128:4,17,19,21 130:13 131:17 154:6 <b>run</b> 12:4 55:16 <b>running</b> 117:12 <b>s</b> <b>s</b> 4:1 <b>safe</b> 77:2 79:19 80:8 100:3,5 104:18 136:1,14 <b>safely</b> 125:14 <b>safety</b> 79:1,25 136:12 137:11 <b>sale</b> 101:24
---	---	---	---

[sales - seven]

Page 23

<b>sales</b> 97:8 105:4	<b>sections</b> 154:8	57:22 59:7 67:22	148:6 154:19
<b>salon</b> 120:16	<b>secure</b> 131:15	67:23 68:19 72:15	<b>set</b> 3:17 24:11
<b>sat</b> 98:19,20	<b>secured</b> 50:7	82:18 108:1	118:13 143:7
<b>saw</b> 129:23 137:14	<b>security</b> 68:5	122:22 131:1	<b>sets</b> 43:15,19 93:1
139:2	69:13 83:24 84:7	133:18,24 146:3,4	<b>settings</b> 55:1
<b>saying</b> 5:4 6:8	84:11,14,16 85:1,5	146:7 151:14	<b>seven</b> 7:21 11:21
17:16 23:24 31:18	85:6,11,16,22 86:5	<b>select</b> 84:20	11:22,25 12:13,15
32:18,20 37:14	86:17,18 87:9,14	<b>selling</b> 67:9	12:22 13:23 14:21
38:19 52:12 54:18	87:20 88:5,9,19,24	<b>sells</b> 32:7	35:6,13,15 39:4
60:13 73:11 74:20	89:1,6,9,13,19,19	<b>send</b> 60:6 94:14,22	40:2,13,16,17,18
75:2,6 81:21 90:6	89:22 90:1,2,7,17	96:20 111:3 123:4	40:22,23,25 41:10
104:2 113:4	91:21 97:17,20,24	130:18	42:6 43:15,22
115:13 117:13	102:23,25 103:1	<b>sending</b> 60:8	45:19,24 46:1,3
135:2,13 138:11	104:24 118:19,20	<b>senor</b> 135:15	56:5,7 57:12 58:5
146:8,12 147:5,11	119:8,12 121:4	141:8	60:4,19 61:4,8,18
150:1 151:16	131:19,21,24	<b>sense</b> 4:20 7:6	68:5 69:8 71:1,25
<b>says</b> 25:12 28:5	<b>see</b> 11:12,13 13:8	41:23 42:5 64:7	72:1,19 73:8 74:1
29:6,22 33:5	17:14 24:22 25:15	<b>sent</b> 22:2 41:4	75:13,16,19,25
82:13 101:16	27:25 29:4,13	47:19 48:4 50:22	76:4,8 78:6,9,14
102:10 106:8,23	30:4,14 33:4,22	51:12,16,17 52:4	78:16,20 79:21,25
116:21 117:14	34:4,22 35:21	52:14 55:12 67:12	80:8 81:14 84:8
118:12 119:17	41:23 47:7 54:18	67:13 83:7 97:11	84:12 85:11,16,20
128:7 129:3,4	63:6 70:23 72:7	112:5 113:4 132:2	86:2,3 87:24
144:2 145:15	72:19 77:13 82:10	132:6 147:17	88:10,23 91:12,21
148:4	83:14,17 90:12	148:5	92:5,11 93:2
<b>scale</b> 127:13	92:14 95:8 103:2	<b>separate</b> 15:8	94:25 97:6,16,20
<b>scan</b> 22:1 141:14	105:20,24 106:14	50:23	97:25 100:4,6
<b>schedule</b> 106:20	106:23 107:20	<b>separately</b> 55:7	104:14 105:8
<b>scheduled</b> 104:21	109:3 116:25	<b>september</b> 10:4	107:1,19 108:2
<b>school</b> 10:19,23	119:18,20 127:14	<b>service</b> 56:10	111:8 112:19
11:3,4,6 61:10	131:3,4,11 133:17	68:18 106:20	114:8 115:13
<b>scope</b> 101:20	137:9,9 140:7,23	112:11	119:12 120:9,25
105:3	141:1,5,15,21	<b>services</b> 19:10,13	122:2,18 123:8,15
<b>score</b> 33:21	144:22 146:21	19:15 20:3,18,21	124:4,7 126:9
<b>search</b> 18:24	149:25 151:12	21:2 24:9 25:19	127:14 128:3
<b>second</b> 23:25 34:9	152:4,9,15	26:10,18,20 29:17	136:15 138:14,17
34:13 45:17 46:23	<b>seen</b> 14:25 20:7	30:10 31:17 32:21	139:8 140:6,12
59:17 63:6 146:4	23:4 32:12 33:7	56:7 57:12 61:2,4	141:14 142:2
148:17	41:19 43:25 44:19	61:18,24 62:14,17	143:4 147:25
<b>section</b> 107:3	45:1 46:17 47:16	71:15 80:21 92:8	148:17 149:18
154:7	47:20 49:20 50:10	117:6 122:2 148:3	150:12

<b>sevincourt</b> 82:6 82:17,22 83:1 116:4 <b>sevincourtapart...</b> 115:17 <b>sex</b> 38:5 50:2,19 51:8,10 <b>sexual</b> 28:13 29:10 30:2 34:8 64:14 65:9 66:1,7,9,13 67:21 <b>sexually</b> 65:8 <b>share</b> 61:16,24 71:16 <b>shares</b> 62:2,2 <b>shattered</b> 115:11 <b>sheet</b> 139:12 <b>shooting</b> 87:16 <b>shop</b> 121:17 <b>short</b> 8:10 75:8,10 77:24,25 121:22 125:7 152:20 <b>shot</b> 87:12 136:9 <b>show</b> 17:5 21:20 21:21 22:8 27:8 33:1 45:17 46:12 49:13 62:23 95:18 97:1 99:14 103:13 105:14 118:17 140:4 142:25 144:15 147:1 149:19 151:1,2 <b>showed</b> 100:18 135:1,3,3 <b>showing</b> 137:4 <b>shows</b> 32:7 <b>sic</b> 90:2 <b>side</b> 24:11 <b>sign</b> 31:17 44:2 106:1,4 114:16 115:12 117:15	143:15 <b>signature</b> 20:17 21:4 30:15 128:12 128:12 143:14,21 156:22 <b>signed</b> 24:1 25:8 25:14,23,25 26:3 28:2,15,19 29:3 105:23 106:6,15 117:9,10 119:7 128:10,11 143:13 143:18 145:2 <b>significant</b> 121:3 <b>signing</b> 28:8 106:15 117:19 <b>simple</b> 53:9 70:4 <b>sir</b> 24:10 35:7 39:9 46:19 64:11 78:10 79:4,6,9,13 85:18 90:20 91:2 93:7 96:8 97:10 105:6 110:23 111:7,10 112:5 113:12 114:10 115:3 117:14 119:4 125:25 135:17,17 136:10,13,16,19 137:10,12 138:7 138:18,19 143:12 147:19 <b>sister</b> 45:22 46:1 47:2,14 48:9,19,24 <b>sister's</b> 123:19,22 <b>sit</b> 71:4 98:8 100:8 120:13 <b>site</b> 41:4 46:6,7 85:7 102:8 103:9 107:3 113:24 115:24 116:2,3 <b>sits</b> 104:7 120:15 120:16	<b>sitting</b> 119:6 124:24 134:7 <b>situation</b> 67:6 120:8,10 149:11 <b>six</b> 116:22 117:16 117:18 <b>sized</b> 141:14 <b>skills</b> 57:19 <b>sleep</b> 47:3 <b>slip</b> 136:21 <b>smell</b> 83:9 <b>smoke</b> 121:14 <b>smoking</b> 103:21 <b>social</b> 33:25 <b>sofa</b> 152:10 <b>software</b> 32:11,12 <b>sold</b> 96:22 <b>solely</b> 154:15 <b>solutions</b> 154:10 154:11,16,17,19 154:21,24 <b>somebody</b> 60:24 80:5 99:3 107:15 128:11 133:17 137:14 <b>sorry</b> 70:14 82:24 85:13 102:9 125:10,13 127:7 127:16 150:2 <b>sort</b> 7:10 34:10 41:10 56:4 86:17 110:11 <b>sounds</b> 7:15 8:15 36:18 63:9 65:24 99:2 120:24 <b>south</b> 14:10 <b>sow</b> 106:8 <b>spanish</b> 42:24 <b>speak</b> 8:16 22:24 114:3,9,15 124:25 130:23 135:22	149:2,7,10 <b>speaking</b> 88:23 152:23 <b>special</b> 41:6 <b>specific</b> 9:19 36:15 42:7 154:22 <b>specifically</b> 8:23 39:12 68:12 120:6 132:19 154:6 <b>specifics</b> 10:16 <b>speculate</b> 7:8 20:6 <b>spend</b> 86:4 92:7 <b>spent</b> 85:11,16,21 92:11 94:24 <b>spiral</b> 71:9 <b>spoke</b> 135:14 <b>spreadsheet</b> 140:23 141:6,19 <b>staffed</b> 8:10 <b>stamp</b> 22:18 <b>stand</b> 19:8 <b>standard</b> 156:14 156:16 <b>standing</b> 126:24 130:7,8 <b>star</b> 56:12,24 57:6 57:7,11 58:1,3,4 59:18,21 60:3 <b>start</b> 12:13 19:15 35:25 49:22 53:9 60:4,8 82:4 84:19 116:22 117:6 <b>started</b> 10:23,24 12:15,16 13:4,6 19:24 53:5,7 57:13,17 66:14 86:19 87:3 151:16 <b>starting</b> 10:19 146:6 <b>state</b> 43:17 91:23 101:3 139:17
---	---	--	---



[state - telephone]

Page 25

154:9 156:2 <b>stated</b> 127:12 156:5 <b>statement</b> 3:15 95:14,14 105:19 106:6,8 117:9 119:7,16 <b>states</b> 1:1 <b>stating</b> 145:23 <b>station</b> 70:3 <b>status</b> 30:2,2 <b>stay</b> 11:1 80:17 92:13,16 93:3,9 138:6 150:13 <b>staying</b> 92:15 114:24 <b>stealing</b> 72:13 <b>step</b> 85:9 115:6 151:21 <b>steps</b> 129:14 <b>stick</b> 55:9 56:4 <b>stickers</b> 21:24 <b>sticking</b> 14:20 <b>stites</b> 2:10 <b>stites.com</b> 2:12 <b>stole</b> 74:20 <b>stolen</b> 72:10 <b>stop</b> 17:10 87:16 90:13 123:4 <b>stopped</b> 13:20 <b>stops</b> 90:14 <b>storage</b> 54:24 <b>stories</b> 67:10 <b>strayer</b> 11:7 <b>street</b> 2:10 65:16 120:15 <b>stress</b> 34:7 <b>strike</b> 88:19 <b>structure</b> 109:21 131:3 140:3	<b>study</b> 126:6 127:20 132:21 135:6 136:24 137:3,14,15 <b>studying</b> 11:8 <b>stuff</b> 15:5 53:19 54:13 92:20,21 120:3 122:24 131:5 133:18 <b>subject</b> 46:15 63:3 82:6 <b>submit</b> 41:19 60:7 84:16 122:25 <b>submitted</b> 154:25 155:1 <b>submitting</b> 41:21 <b>subpoena</b> 105:17 <b>substance</b> 4:12 6:20,24 <b>suit</b> 144:19 <b>suite</b> 2:6 <b>summary</b> 103:12 <b>summer</b> 100:6 114:7,20 <b>supervise</b> 12:2 <b>supervised</b> 127:5 <b>supervisor</b> 8:14,16 12:7 13:2,3,5,21 26:22,25 68:19 87:25 <b>supervisors</b> 12:22 <b>supportive</b> 71:5 135:4 <b>supposed</b> 112:10 112:19,24 146:22 151:23,24 152:7,8 <b>supreme</b> 150:8 <b>sure</b> 4:14 5:13 6:13,22 7:3,12 9:13,19 12:3 16:20 18:7 19:16	19:17 20:23 21:17 23:19 27:19 30:16 31:10,10 32:9,9 33:11 35:10 37:3 38:23 39:5 42:12 47:17 48:2 52:15 52:16 53:1,11 54:2 59:23 78:7 78:24 79:17 83:4 84:10 86:11 87:5 92:13 93:9,15 94:10 96:4 97:22 100:22,25 110:23 127:16 130:13 138:25 139:1 140:17,20 144:11 145:24 146:9 <b>surely</b> 11:16 <b>surprised</b> 44:7 148:10 <b>swearing</b> 6:12 <b>swimming</b> 129:6 <b>swiper</b> 98:12 <b>swore</b> 6:15 <b>sworn</b> 4:3 6:11 <b>system</b> 115:21 145:18 146:16 152:12 <b>t</b> <b>t</b> 81:18 <b>table</b> 124:18 <b>tabs</b> 41:24 <b>tacharmne</b> 23:13 23:14,14 <b>take</b> 24:22 32:8 74:5 75:8 77:22 77:24 79:24 80:12 80:15 102:18 112:6 114:13 121:20 122:25 132:4 133:12	135:6 152:17 <b>taken</b> 4:18 33:15 75:10 77:25 121:22 125:7 152:20 156:5 <b>takes</b> 36:8 <b>talk</b> 5:1,5 8:22 10:12 17:13 44:9 56:2 70:3 71:22 80:14 81:15 95:4 121:6,12 124:16 133:9 136:19,21 149:17 <b>talked</b> 8:3,13,24 9:15 47:24 48:5 85:13 109:15 112:12 128:17 133:14 <b>talking</b> 8:8 17:11 17:15 22:15 48:10 72:24 75:13 120:2 125:24 129:1 133:23 137:6 138:12 <b>tape</b> 101:7 112:6 <b>taped</b> 112:6 <b>target</b> 137:17 <b>tasharah</b> 45:22 123:11 <b>task</b> 140:21 <b>tax</b> 41:1 <b>tdhda</b> 34:21 <b>teach</b> 12:2 77:20 <b>teaching</b> 151:20 <b>team</b> 71:6 <b>tech</b> 12:8 55:4 <b>technical</b> 77:10 <b>technically</b> 114:2 <b>technology</b> 100:10 <b>telephone</b> 7:16 16:11
--	--	---	--

[tell - time]

Page 26

<b>tell</b> 5:8 6:2,18,24 10:4,19 11:20 14:5 20:25 22:21 30:23 31:2 32:1 35:18 51:10 52:21 53:14 56:9 58:14 58:21 64:24 66:4 69:11 70:2 72:3 76:1 80:24 84:13 92:2 94:12 95:10 96:14 105:7 111:5 118:1 120:8 121:12 124:9,11 126:1 129:19 130:23 131:7,8,13 131:15 135:15,23 136:11 137:23 138:3 142:1,21 146:3	149:2,7,22 150:6,9 <b>tend</b> 72:1,7 <b>tennessee</b> 55:18 <b>term</b> 105:5 <b>terminated</b> 59:3 <b>terms</b> 4:21 7:18 21:23 40:19 60:2 124:20 154:16 <b>testified</b> 4:4 5:25 148:18 <b>testimony</b> 44:23 99:2 119:1 122:1 <b>text</b> 16:7,12 18:14 18:20 19:1 49:24 50:21,23,23,25 52:8,10,13 55:1 65:13 <b>texted</b> 50:13,22 52:7,10,12 <b>texting</b> 17:2,21 50:2,16 52:9 65:25 66:22 <b>texts</b> 9:23 65:22 66:1 <b>thank</b> 18:2,4,9,18 19:4,4 86:16 125:10,18 153:1 <b>thanks</b> 58:13,15 83:13 <b>thing</b> 5:1 10:11 17:20 20:24 22:16 49:22 57:15 66:21 72:12 125:12 137:18 139:1 <b>things</b> 4:13 10:15 11:17 21:22 34:7 35:25 36:9 40:20 54:25 55:10 65:9 65:14,18 66:2 67:5 68:10,11,14 71:9,13 72:15,18	74:19 75:3,7 92:18 93:11 94:3 95:8 105:4 112:9 120:18 122:6 127:5 135:7 136:22 137:8 138:11,20,22,22 138:24 152:18 <b>think</b> 7:19 11:16 13:22 18:11 20:20 21:5,7,8 23:4 25:24,25 26:4,6,19 29:21 30:18 36:18 36:20,22,24 37:2 37:18,21 38:1 40:15 41:9,19 42:9 43:17 45:14 48:8 49:7 50:22 52:13 58:7 59:7 59:17 63:24 65:18 67:23 68:4,6 70:23 76:13 77:1 78:11,17,19 80:25 81:20 83:16 84:22 85:13 88:23 89:2 89:3,8,12 90:4 91:4 96:3 99:5,23 101:19 104:14 107:18 118:22 119:5 123:7 124:20,23 125:23 126:5,17 127:1 134:13,16,18,20 134:25 135:8,9,11 136:14 137:13,16 137:17 139:23 145:8 146:3,25 148:18 149:15 150:17 <b>thinking</b> 8:6,13 121:10	<b>third</b> 32:17 33:19 34:14 105:22 <b>thomas</b> 1:21 156:24 <b>thought</b> 23:18 49:2 67:23 69:11 72:24 87:8 102:12 133:21 <b>thre</b> 39:7 <b>thread</b> 49:17 82:3 82:5 151:10,16 <b>threaten</b> 138:13 139:2 <b>three</b> 47:3 48:17 50:4 69:12 72:10 83:10,13 84:15 98:6,10 104:6 106:19 117:17 141:17 <b>thrilled</b> 148:18,21 <b>thrown</b> 126:20 <b>thursday</b> 55:12,17 <b>time</b> 8:13 12:22 13:3,5 32:1 40:11 45:13 53:22 65:10 65:13 67:2 68:3 68:25 69:13,20 70:2 71:1 73:20 78:5 79:2 87:24 88:2,11 94:4 100:24 104:2,21 105:5 112:20 113:9 115:16 121:12 125:15 126:9 127:11 129:15 131:16 133:13 134:11 138:21 147:17 148:18,25 149:6 150:5 154:22
---	---	--	---

[times - understand]

Page 27

<b>times</b> 5:23 9:19,22 18:15 44:17 71:8 79:21 124:6,7 134:2 <b>tires</b> 120:18,21 <b>title</b> 13:12,12 147:24 <b>tmi</b> 19:7,8,10 60:13 61:1 80:21 <b>today</b> 4:10,15 6:19 7:5 11:15,20 21:19 23:2 47:1 109:16 119:6 134:7 <b>toilet</b> 116:1 <b>told</b> 18:11 21:3 37:22 40:8 47:5 49:3 55:18 59:17 60:24 68:2 69:14 71:1 88:21 101:19 101:23,24 103:5,7 103:17 104:17 105:1 112:16 118:18 119:5 126:5 130:17,25 133:11,25 135:19 135:20 138:7 146:18 148:21 <b>tone</b> 135:18 <b>top</b> 24:4 25:5,13 33:4 83:14 91:9 97:5 101:17 102:11 106:5 107:22 108:13 <b>topics</b> 66:1 <b>tough</b> 43:6 <b>toya</b> 47:2 49:24 50:2 55:12 63:12 94:5 105:23 107:14	<b>tpi</b> 3:6,7,8,9,10,11 3:12,13,14,18,20 3:21,22 7:21 14:12 18:19 19:2 19:8,10,12,15,25 20:2,9,17,21,21 21:1,1 22:10,11,17 22:18 23:15 24:4 24:9,18 25:1,11,18 25:23 26:10,11,18 26:19 27:12 29:1 29:17 30:9 31:16 31:16 32:18,21 33:2 36:7 39:2,12 39:12,25 40:11 43:20,22,23 46:13 49:15 58:3,9 60:9 60:13,15,22,25 62:24 68:10,23,23 69:3,25 78:7,11 81:13 82:2 85:25 97:1 106:16 110:21 112:11 118:4,4,18 123:13 128:1,3,22 130:14 140:4 141:5 144:15 147:1,15 147:22 148:3,6 151:6,9 <b>tpi's</b> 29:22 30:6 80:22 105:18 112:16 <b>track</b> 115:22 <b>tracker</b> 93:12 <b>traffic</b> 6:4,4 <b>train</b> 12:1 <b>trained</b> 90:10 <b>training</b> 32:5 35:6 39:6,7 90:3 <b>trainings</b> 32:3,6	<b>trane</b> 93:17 <b>transcript</b> 18:7 33:5,14 152:24 154:23 156:4,7 <b>transcripts</b> 154:23 155:2 <b>trash</b> 102:23 120:3 120:8,21 121:19 131:5,14 <b>treat</b> 31:7 <b>tremendously</b> 68:18 <b>triangle</b> 48:11,13 48:16,17,21,25 <b>trick</b> 87:7 <b>tricking</b> 60:14 87:6 <b>tricks</b> 60:16 <b>tried</b> 57:22 131:8 132:24 136:19 <b>trigger</b> 71:10 <b>truck</b> 5:13,14 <b>true</b> 51:14 124:11 154:24 156:8 <b>try</b> 5:4 10:9 11:2 53:8 92:12 93:9 120:20 121:5,15 122:23 133:9 136:20 138:7 149:5 <b>trying</b> 32:14 39:20 41:24 50:1,18 72:14 87:7 93:3 99:9 109:23 118:16 121:9 130:5 143:19 <b>turn</b> 6:16 40:16 117:18 137:19 <b>two</b> 34:25 37:1 40:10 42:12,23 44:19 45:1 53:24	70:24 72:23 74:20 101:4 106:19 117:12,16 <b>twynn</b> 107:4,11 116:4 <b>type</b> 20:24 38:18 41:5 66:16 79:12 88:19 134:11 <b>typed</b> 145:22 <b>types</b> 42:13 <b>typewriting</b> 156:7 <b>typical</b> 72:15 <b>typically</b> 131:24 <b>typo</b> 107:8,12
<b>u</b>			
<b>uh</b> 13:10,24 15:13 16:9 17:16 36:21 56:19 83:15 92:6 137:16 141:22 147:21 <b>ultimately</b> 104:23 <b>unarmed</b> 89:3,5,6 89:7 90:1,4,17 91:21 <b>uncle</b> 71:19 <b>uncomfortable</b> 124:1 <b>underneath</b> 39:3 <b>understand</b> 4:17 7:6,12 8:15 9:2 17:3 20:5 23:21 23:23 31:23 32:2 33:14 35:10 38:8 39:10,11,17 40:6 41:9 42:19 47:22 48:2,23 59:7 60:10,11,12 67:25 80:1,13 84:6,10,20 91:4,17 96:5 98:17,25 104:13 104:22 117:8			



123:25 134:20 135:21 147:10 148:7 149:3,16 150:4 <b>understandably</b> 63:10 <b>understanding</b> 26:9 30:6,23 31:10 33:16 66:18 82:19 85:19 86:7 94:19 97:15 <b>understood</b> 7:11 <b>unfortunate</b> 127:11 <b>unfortunately</b> 21:25 69:10 112:7 <b>unintelligible</b> 6:3 127:2 <b>unintentional</b> 29:23 <b>unit</b> 63:5 93:20 109:16 <b>united</b> 1:1 <b>units</b> 40:25 41:1 93:14,16,17,18 140:24 141:14,17 <b>unsafe</b> 79:3,7,21 <b>unsupervised</b> 127:11 <b>untrue</b> 52:6 <b>upload</b> 95:15 <b>uploaded</b> 100:10 155:3 <b>upper</b> 101:14 <b>ups</b> 114:13 <b>upset</b> 48:14,24 63:10 <b>urinate</b> 121:14 <b>use</b> 14:23,25 15:3 16:1,3,6,11 18:14 43:21 54:5,11,16	72:8 95:13 96:17 98:12 115:21 116:2,3 129:5,7 145:17,18 <b>usually</b> 54:13 <b>utilization</b> 118:20 <b>uttered</b> 138:16  <b>v</b>  <b>v.m.f.</b> 1:5 <b>vandalism</b> 102:21 102:22 105:6 <b>variance</b> 95:7,10 95:13,24 <b>various</b> 18:15 96:7 104:10 124:6,7 <b>vehicle</b> 136:7,8 <b>vendor</b> 32:17 58:6 59:19 60:3,7 65:19 84:20 96:19 97:16,19 99:22 <b>vendors</b> 12:2 57:18 58:2 84:15 96:17 99:17,23 122:12 <b>verbal</b> 4:22 <b>verbally</b> 138:11 <b>verbatim</b> 154:13 <b>verified</b> 74:6,11,15 <b>verify</b> 144:12 <b>veritext</b> 154:10,11 154:16,17,19,20 154:24 <b>veteran</b> 30:2 <b>victims</b> 132:16 <b>video</b> 47:19 48:3 106:10 120:19 154:10,17,19 <b>videoconference</b> 1:17 <b>view</b> 130:17	<b>views</b> 69:2 90:16 <b>violate</b> 39:13 <b>violation</b> 6:4 <b>violations</b> 104:2 <b>visitors</b> 129:13 <b>visual</b> 99:24 <b>voice</b> 15:22 44:8 <b>volunteer</b> 71:15 <b>vote</b> 89:21 90:21 90:21,23,24 91:18 91:18 <b>vs</b> 1:8 <b>vulnerability</b> 102:24,25 105:2,8 <b>vulnerable</b> 102:20 102:21,22 103:18 104:10,15  <b>w</b>  <b>w9</b> 59:25 <b>waiting</b> 41:3 <b>walk</b> 60:2 67:24 86:17 113:16 114:8,13 131:11 <b>walked</b> 55:15 114:15 <b>walking</b> 98:9 113:5 131:1 <b>walks</b> 114:1,19 <b>wall</b> 47:9,11 <b>want</b> 7:3,8 9:18 10:1,16 19:5 20:1 20:4,6,6 21:17 23:11 29:19 32:13 36:4,10,10 43:10 47:12 48:2,8 49:22 52:25 56:4 59:5 60:14,17 63:10,13 66:16,19 75:13 77:17 80:3 80:4,5 82:16 84:5 84:10 86:17 89:25	90:2,20 98:25 100:22 101:3,12 104:9 107:17 108:16 115:10 116:9 118:14 123:3 124:13,14 125:18 126:16 131:17 134:20 140:17 150:2,19 151:1,7 152:17,25 <b>wanted</b> 5:13 7:7 23:18 33:11 47:20 71:3 78:24 87:4 98:2 99:6 116:1,7 133:17 149:25 152:24 <b>wanting</b> 57:17 <b>wants</b> 84:4 <b>watch</b> 98:22 <b>watching</b> 121:8 <b>water</b> 122:21,22 <b>way</b> 33:19 34:14 38:24 43:11 46:5 53:11 64:14 66:6 66:13 90:10 103:15 119:12 131:2 149:15,20 151:24 <b>we've</b> 14:25 20:7 48:19 65:21 72:4 73:14 146:3,4 <b>weapon</b> 80:6 81:4 81:7,12 <b>wear</b> 81:4 <b>web</b> 113:24 115:24 116:2,3 <b>week</b> 8:3,17 <b>weekends</b> 53:25 <b>weeks</b> 9:8 101:4 116:22 117:3,16 117:17,18
---	--	--	---

[weigh - zoom]

Page 29

<b>weigh</b> 86:14 <b>went</b> 10:22 26:6 48:5 50:3 61:9 68:18 70:7 94:24 102:12 113:11 118:22 133:7,8,16 143:8 <b>whispering</b> 126:12 126:13 <b>white</b> 42:9 <b>window</b> 93:20 98:8 132:25 <b>wing</b> 71:13 <b>winning</b> 99:19 <b>witnes</b> 108:12 <b>witness</b> 5:18 17:23 18:1 19:20 26:22 31:21 37:5,11 59:2,3,15 66:10 73:13 74:9 76:20 109:8 123:22 124:16,22,25 125:4,8 134:25 147:10 148:13 149:13 <b>witnessed</b> 72:20 <b>witnesses</b> 155:2 <b>woman</b> 40:9 48:22 <b>won</b> 37:16,18 <b>wondered</b> 23:1 <b>word</b> 24:21 103:7 103:7,22 104:4 138:16 <b>wording</b> 52:11 105:6,11 <b>words</b> 5:4 85:6 101:5 <b>work</b> 3:15 8:9 10:14,14,20 11:20 11:21 14:23 15:1 15:6,17 16:11,21	18:13 19:6 22:2 26:17,19 27:5 35:15 39:3 40:22 53:25 54:2 56:25 57:20,25 58:4,24 59:10 60:4 62:9 66:22 67:4 68:18 76:14 80:12,15 82:21 86:13 89:5 90:19 93:25 94:6 101:6 104:18,21 105:19 106:6,8 113:25 114:25 115:14,18 116:12 117:9,17 119:7,16 122:6 123:1 126:11 <b>worked</b> 10:25,25 14:11 67:2 71:18 79:12,14 88:15,25 100:7 113:12 122:9,10 127:4 <b>workers</b> 57:18 59:24 <b>working</b> 5:11 10:24 12:13,15 14:16 19:15,24 39:25 68:22,24 69:17 70:25 71:5 73:20 74:1 116:2 126:24 127:3,9 130:2 131:11 138:10 <b>works</b> 7:21 26:25 27:3,4 71:14 84:14 122:7 <b>wow</b> 54:10 <b>wright</b> 45:22 123:11 <b>write</b> 21:25 58:22 109:17 116:13	150:20,21,22,25 151:11,17,20,21 151:25 <b>writes</b> 4:22 <b>writing</b> 138:8 152:4 <b>written</b> 30:8 31:18 51:17 130:1 <b>wrong</b> 42:16 61:13 86:22 105:1,7 145:6,21 146:19 <b>wrote</b> 25:4 51:11 58:23 83:11,11,16 102:7,16 <b>wynn</b> 1:14 4:2,7 18:11 22:6,20 23:2,16 24:22,25 27:14 33:4,5 46:13 50:9 56:6 63:1 75:13 78:4,5 82:2 99:3 102:18 105:23 116:19 121:25 147:24 <b>wynn's</b> 107:14	<b>year</b> 20:13,16 21:5 25:25 26:4 35:1 57:13 88:13 94:8 112:2 113:3 142:17 143:5,8 144:9,20,25 146:4 <b>years</b> 11:2 32:22 32:23 37:1 46:6 79:13 <b>yell</b> 44:7,10 <b>yelling</b> 44:13 <b>yellow</b> 96:18 <b>yep</b> 8:1 17:8
			<b>z</b>
			<b>zamora</b> 94:17 95:1 151:10 <b>zamora's</b> 94:19 <b>zelle</b> 57:22 <b>zoom</b> 1:17 17:12
		<b>x</b>	
		<b>x</b> 108:5,10	
		<b>y</b>	
		<b>y'all</b> 50:20 73:19 <b>yeah</b> 5:14,17 7:2,2 7:5 8:21 9:17 15:9 26:14 32:11,12,16 37:10 47:8 48:18 58:20 69:7 73:1 75:18 81:13 95:5 100:16,21 101:16 106:1,2 115:5 122:9,16 125:2,4 126:19 130:12 133:16 134:23 146:1 148:5 150:1	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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